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Volume III: Responses to Comments

June 1996

BART-SAN FRANCISCO AIRPORT EXTENSION

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FINAL
ENVIRONMENTAL IMPACT STATEMENT

FINAL
ENVIRONMENTAL IMPACT REPORT

VOLUME III: RESPONSES TO COMMENTS ON THE FRDEIR/S#2DEIS

BART-SAN FRANCISCO INTERNATIONAL AIRPORT EXTENSION

NORTHERN SAN MATEO COUNTY
CALIFORNIA

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION (FTA)

SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT (BART)
SAN MATEO COUNTY TRANSIT DISTRICT (SAMTRANS)

WITH COOPERATING AGENCIES:

U.S. ARMY CORPS OF ENGINEERS
FEDERAL HIGHWAY ADMINISTRATION
FEDERAL AVIATION ADMINISTRATION

JUNE 1996

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BART-San Francisco
International Airport
1996.

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1.1 PURPOSE OF THIS VOLUME

This Volume III of the BART–San Francisco Airport Extension Final Environmental Impact Report/Final Environmental Impact Statement (FEIR/FEIS) responds to comments received on the Focused Recirculated Draft EIR/Supplemental #2 Draft EIS (FRDEIR/S#2DEIS) concerning the proposed BART extension. Comments have been submitted either as letters or as oral testimony during a public hearing held on November 16, 1995, during a 45-day public comment and review period that extended from October 6, 1995 through November 20, 1995.

The BART and SamTrans boards must consider these responses and make specific findings that the FEIR complies with the California Environmental Quality Act. Similarly, the Federal Transit Administration (FTA) must approve the FEIS. These steps must occur before a project can be adopted.

1.2 ORGANIZATION OF THIS VOLUME

This document includes written and oral comments made during the public review on the September 1995 FRDEIR/S#2DEIS, and responses to those comments. Chapter 2 of this volume provides a list of all commentors on both the January and September 1995 draft documents, organized in the following sequence: federal agencies, state agencies, local agencies, organizations, businesses and individuals, and individuals who commented at public hearings for the project. Within each of these categories, individual commentors are alphabetized.

In many FEIR/FEISs, photocopies of comment letters are reproduced, with each discrete comment bracketed and numbered, and the response to that comment correspondingly numbered and provided immediately following a copy of the comment letter. Because of the volume of letters received on the proposed BART–San Francisco Airport Extension, discrete comments were identified and abstracted verbatim from the letters. Abstracts from the comment letters are presented in Chapter 3 in the same sequence of commentors in Chapter 2. A response to each comment directly follows that comment.

In order to find responses to a particular comment letter or speaker, please refer to the list in Chapter 2 for the commentor's name, business, or organization. Each commentor has been assigned a discrete identification number and responses are provided in Chapter 3 by this commentor identification number. Thus, Response 4.12 in Chapter 3 refers to Commentor 4 and the response to Comment 12 in his/her letter.

Responses generally provide clarification, explanation, or elaboration. In some cases, they also modify or correct text of the FRDEIR/S#2DEIS. For easy reference, all such revisions are indented within a response in Chapter 3, and are also summarized in Chapter 4 of this volume. Thus, for example, if a reviewer wanted to see if the text of the draft documents had been changed, he/she would refer to Chapter 4 of this volume and see if the page he/she were interested in was listed. If not, then changes to that page have not been made in response to comments. If, however, the page were listed, Chapter 4 would identify the Response Number triggering the text change and present the text modification.

1.3 ENVIRONMENTAL REVIEW PROCESS AND SELECTION OF AN LPA

DEIR/SDEIS

The DEIR/SDEIS of January 1995 evaluated potential impacts and proposed mitigation measures for the following seven alternatives: the Proposed Project, which was selected at the conclusion of the 1992 Alternatives Analysis study as the Locally Preferred Alternative (1992 LPA); a "No Build" Alternative, which assessed the impacts of not undertaking any project (Alternative I); a Transportation Systems Management Alternative, which analyzed the effects of future transportation improvements other than the BART extension (Alternative II); and four BART build alternatives (Alternatives III, IV, V, and VI) with terminus stations in San Bruno, the SFIA, or Millbrae. Three design options representing variations on the BART build alternatives were also studied.

The DEIR/SDEIS was circulated to approximately 440 agencies, organizations, and individuals and was made available at all libraries and city halls within the project corridor. One hundred and fifty persons testified at public hearings, held February 15, February 18, and March 4, 1995 to solicit comments on the DEIR/SDEIS. By the conclusion of the public comment period on March 13, 1995, approximately 260 agencies, organizations, and individuals had submitted written comments on the DEIR/SDEIS. In total, approximately 3,000 discrete written and verbal comments were received. The substance of these comments is summarized in the *Summary Report of BART-San Francisco Airport Extension Agency, Organization, and Individual Comments*, found in Appendix E of the May 1995 *BART-San Francisco Airport Extension Locally Preferred Alternative Report*. This document is available for public review at the BART offices located at 1000 Broadway, Oakland, California.

Based on public comment and considerations of transit ridership, service to the SFIA, and environmental impacts, the BART and SamTrans boards on April 27 and 28, 1995 selected Alternative VI-BART to Millbrae via the planned Airport International Terminal as the LPA. This decision defined Alternative VI as the local recommendation for more detailed engineering and final environmental documentation.

The selected route would follow the San Bruno branch of the Southern Pacific Transportation Company (SPTCo) railroad between Colma and San Bruno, and then merge with the CalTrain mainline through downtown San Bruno. South of Angus Avenue in San Bruno, the BART subway alignment would turn southeast under Highway 101 to the planned International Terminal at the SFIA, and then turn southwest back under Highway 101 to the CalTrain mainline. The proposed extension would terminate at a station at Millbrae Avenue in Millbrae, with a tailtrack extending 1,500 feet into Burlingame. Stations would be provided at Hickey Boulevard, Tanforan Park Shopping Center, the SFIA at the planned International Terminal, and at a BART/CalTrain intermodal station on Millbrae Avenue. The Alternative VI LPA calls for a subway configuration between Colma and South Spruce Avenue in South San Francisco; a retained cut alignment from South Spruce Avenue to Euclid Avenue in San Bruno; a subway alignment through downtown San Bruno, turning southeast in tunnel to the planned Airport International Terminal, and returning to the CalTrain mainline at Hillcrest Avenue in Millbrae; and an at-grade Millbrae Avenue Station with tailtracks extending south to Trousdale Avenue in Burlingame.

FRDEIR/S#2DEIS

Following the selection of the Alternative VI LPA, several events occurred that resulted in a reevaluation of the Alternative VI LPA. Specifically:

- MTC Resolution No. 2451, which supported BART's preliminary engineering grant application to the FTA, was partially conditioned on the understanding the BART would identify and implement feasible cost containment strategies;
- the U.S. Congress House Appropriations Committee directed that BART consider less expensive design options for extending BART service to the SFIA;
- the BART and SamTrans Boards of Directors directed consideration of an aerial configuration across the SFIA property west of Highway 101 and an aerial airport station at the SFIA's proposed International Terminal;
- the San Francisco Airports Commission voted to support an aerial configuration across the SFIA property west of Highway 101 and an aerial airport station at the SFIA's proposed International Terminal (although at a different location and elevation than desired by the BART and SamTrans boards); and
- BART and the San Francisco Airports Commission passed resolutions to adopt passenger service quality standards for a BART station at the SFIA.

Given these circumstances, a Focused Recirculated Draft Environmental Impact Report/Supplemental Draft #2 Environmental Impact Statement (FRDEIR/S#2DEIS) was prepared to evaluate an aerial, rather than tunnel, alignment into the San Francisco International Airport (SFIA); two aerial station options (Options B and X) at the SFIA, BART service directly to the Millbrae Avenue Station from the Tanforan Station along the CalTrain mainline, and a re-design of the Millbrae Avenue Station. Collectively, these changes comprise the Aerial Design Option to the Alternative VI LPA. The FRDEIR/S#2DEIS did not evaluate the segment of the Alternative VI LPA alignment between the Colma BART Station and Angus Avenue in San Bruno because no changes were proposed to this segment.

A 45-day public comment period concluding on November 20, 1995 and one public hearing held on November 16, 1995 in Millbrae provided opportunity for public comments on the FRDEIR/S#2DEIS. Seventy-two comment letters were received and 50 individuals spoke at the public hearing. The substance of the comments submitted on the FRDEIR/S#2DEIS is summarized in the *Summary Report of Agency, Organization, and Individual Comments*, found as Attachment C to the December 1995 *BART–San Francisco Airport Extension Locally Preferred Alternative Report*. This document is available for public review at the BART offices located at 1000 Broadway, Oakland, California.

Locally Preferred Alternative

On November 28, 1995 the BART Board adopted the Alternative VI Aerial Design Option as the new LPA. On November 29, 1995 the SamTrans Board passed a similar resolution in support of the Aerial Design Option LPA. The new LPA is similar to the Alternative VI LPA with the following differences:

- revenue service track would be split into two portions, with one providing a direct connection from the Colma BART Station tailtracks to the Millbrae Avenue Station and an east-west aerial wye stub perpendicular to the CalTrain/BART mainline terminating at the SFIA;
- certain design refinements suggested by the cities along the project corridor would be incorporated, including:

- improvements to Colma Creek in the vicinity of the Hickey Station in South San Francisco (instead of placing the creek in a box culvert);
 - lowering the BART subway profile under South Spruce Avenue in South San Francisco, allowing the street to maintain its existing grade (instead of changing the street profile to bridge over the BART alignment);
 - south of South Spruce Avenue, the alignment is in subway and shifts westward to accommodate proposed design refinements at the Tanforan Station (instead of a retained cut alignment along the SPTCo tracks);
 - a subway Tanforan Station within the Tanforan Shopping Center, along with certain other suggestions made by the City of San Bruno (instead of a retained cut station adjacent to the SPTCo tracks and the Fifth Addition neighborhood);
 - south of Angus Avenue in San Bruno, the horizontal and vertical alignment would be that proposed by the Aerial Design Option to Alternative VI and evaluated in the FRDEIR/S#2DEIS (see description above); and
 - the Millbrae Avenue Station would be redesigned to incorporate certain suggestions by the City of Millbrae, including reorientation of the parking garage, addition of another access road to the garage, and changes to the internal circulation within the station; and
- the car wash proposed on the SFIA west of Highway 101 has been relocated to the Daly City shop/yard in Colma, to avoid impacts to wetlands and endangered species habitat.

1.4 ORGANIZATION OF THE FEIR/FEIS

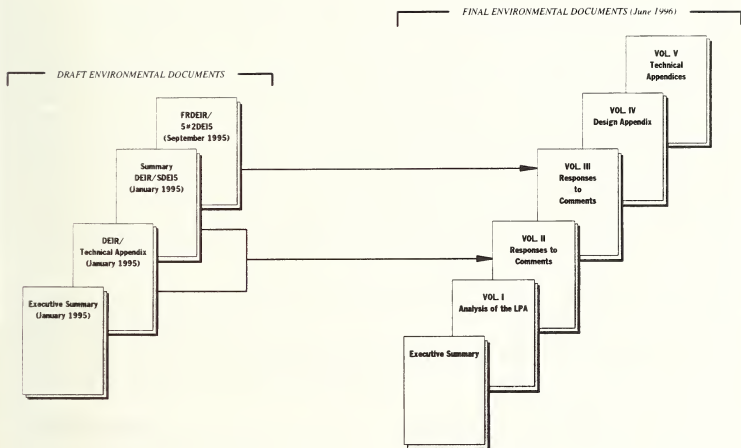
The FEIR/FEIS for the BART–San Francisco Airport Extension Project is composed of five volumes and an Executive Summary (Figure 1-1).

Volume I of this FEIR/FEIS revises the January 1995 DEIR/SDEIS and the September 1995 FRDEIR/S#2DEIS to focus the environmental analysis on the Aerial Design Option LPA. Volume I also incorporates clarifications and corrections resulting from public comments on both the January and September 1995 draft documents and on design refinements made since January 1995.

Volume II of this FEIR/FEIS includes written and oral comments made during the public review on the January 1995 DEIR/SDEIS, and responses to those comments. The organization of this volume is identical to that of Volume III (see Section 1.2 of this chapter).

Volume III contains comments and responses associated with the FRDEIR/S#2DEIS of September 1995. The organization of this volume is described in Section 1.2 of this chapter.

Volume IV provides the reader with the plans and profiles of the selected LPA (the Alternative VI Aerial Design Option), and **Volume V** contains supporting environmental documentation, such as the Endangered Species Act Section 7 Biological Opinion of the U.S. Fish and Wildlife Service for the endangered San Francisco garter snake, and the National Historic Preservation Act Section 106 documentation for effects to significant cultural resources.



Finally, the **Executive Summary** is a succinct document describing the Aerial Design Option LPA and the identified impacts and mitigation measures. It includes sections on the project's background, purpose, and need; project alternatives; significant adverse impacts of the Aerial Design Option LPA; and mitigation measures to avoid or reduce impacts. Impacts that cannot be reduced to an insignificant level are also identified.

Chapter 2

List of Commentors

2.1 INTRODUCTION

This chapter presents a list of all individuals who submitted comments on the September 1995 FRDEIR/S#2DEIS. A list of commentors on the January 1995 DEIR/SDEIS is also provided to give a complete listing of all individuals who submitted letters or provided oral testimony of the draft environmental documents. If a person finds his/her name or organization under the list of commentors for Volume II, then that individual provided remarks on the January 1995 DEIR/SDEIS and he/she will find responses in Chapter 3 of Volume II. If a person finds his/her name or organization under the list of commentors for Volume III, then that individual provided remarks on the September 1995 FRDEIR/S#2DEIS and he/she will find responses in Chapter 3 of this volume. Commentors who submitted letters have been organized alphabetically within the following groups: federal agencies, state agencies, local agencies, organizations, and individuals and businesses. Each commentor is assigned a discrete identification number. Thus, even though an individual may have submitted multiple letters, all letters by the same individual have the same commentor identification number. This enables each commentor to review responses to his/her comments all together, rather than dispersed throughout this chapter. Those individuals who provided oral testimony at one of the public hearings are organized alphabetically in a list, "Speakers," distinct and separate from the written comments. As with the comment letters, even though an individual may have spoken at more than one hearing, all oral comments by this individual have been aggregated under a single, discrete speaker identification number.

2.2 VOLUME II COMMENTORS

The following individuals submitted comments on the January 1995 DEIR/SDEIS. Responses to their comments are contained in Volume II of this FEIR/FEIS.

Federal Agencies

1. U.S. Department of the Interior
2. U.S. Department of Transportation,
Federal Aviation Administration
3. U.S. Environmental Protection Agency

State Agencies

4. California State Department of Fish and
Game
5. California State Department of Toxic
Substances Control
6. California State Department of
Transportation (Caltrans)

State Agencies (continued)

7. Governor's Office of Planning and
Research
8. California State Public Utilities
Commission

Local Agencies

9. Alameda-Contra Costa Transit District
10. City/County Association of
Governments of San Mateo County
11. Peninsula Corridor Joint Powers Board
12. City and County of San Francisco
Planning Department
13. City of Brisbane

Local Agencies (continued)

14. City of Burlingame
15. City of Daly City
16. City of Millbrae
17. City of San Bruno
18. City of San Bruno City Council
19. City of South San Francisco
20. City of South San Francisco Office of the Historic Preservation Commission
21. Millbrae School District
22. San Bruno Park School District
23. San Francisco County Transportation Authority
24. San Francisco International Airport
25. San Mateo County Department of Public Works
26. San Mateo County Transportation Authority
27. San Mateo Union High School District
28. South San Francisco Unified School District
29. Town of Colma

Organizations

30. Air Transport Association
31. Associated General Contractors of America, California
32. Belle Air Elementary School PTA
33. Belle Air Neighbors
34. Boys & Girls Clubs, North San Mateo County
35. Building and Construction Trades Council of San Mateo County
36. Burlingame Beautification Commission
37. Burlingame Chamber of Commerce
38. Burlingame Homeowners Association
39. City Hall Watch
40. Coalition of Colma Cemeteries
41. County Council, Leagues of Women Voters of San Mateo County

Organizations (continued)

42. Fifth Addition Neighborhood Association
43. Garden Valley Homeowners Association
44. Redwood City San Mateo County Chamber of Commerce
45. Regional Alliance For Transit
46. San Bruno Chamber of Commerce
47. San Bruno Citizen's Coalition
48. San Francisco Bay Trail
49. San Francisco Planning and Urban Research Association
50. San Francisco Tomorrow Transportation Committee
51. San Mateo County Central Labor Council
52. San Mateo County Economic Development Association
53. San Mateo County Restaurant & Hotel Association
54. Sierra Club
55. South San Francisco BART Citizens Advisory Committee
56. South San Francisco Chamber of Commerce
57. Train Rider's Association of California

Individuals and Businesses

58. ABC Locksmith Company
59. Abco Printers
60. Acha, Ma. Isabel M.
61. Agid, Gwen
62. Airport Auto Parts, Inc.
63. Albert, Peter
64. Alentiev, Tim
65. Allen, Robert S.
66. Artichoke Joe's
67. Azzopardi, Philip C.
68. Bays, Walter
69. Belknap, Erlys

Individuals and Businesses (continued)

70. Belknap, Joni
71. Bike Route Inc.
72. Bisson-Barnes, Alice
73. Boyd, Donald W.
74. Bracker, Jessie
75. Brun, Gottfried
76. Brunzie, Suzanne
77. Bugler, Helen and Joan
78. Bullis, Greg H.
79. Burke, Patricia
80. Burris, Elaine R.
81. Burtzloff, Lorraine
82. Bywater, D.F.
83. Cadona, Anna
84. Cadona, Bruno
85. Cameron, Charlie
86. Camilleri, Mary
87. Campbell, Daniel
88. Cano, Anne
89. Cassanego, Gilda
90. Castro, Virgilio
91. Chambers, Tom
92. Chavéz, José
93. Chen, Tony
94. Chow, Arthur M.
95. Cid, Liza
96. Clark, Richard G.
97. Code Three Lock and Gun
98. Colarusso, Al.
99. Colma Residents (11 People)
100. Concerned Neighbors in Winston Manor
101. Cook, Theresa
102. Cypress Lawn Cemetery
103. De Anda, Katharine
104. Del Rosario, Ernesto
105. Dental Associates

Individuals and Businesses (continued)

106. Downing, Lorraine C.
107. Dreiling, Martin L.
108. Dubois, Mike
109. Everett, Dorothy
110. Falsarella, John and Caimotto, Joseph W.
111. Fay, James S.
112. Fernando, David
113. Field, Linda L.
114. Fijana Salad Bar & Sandwich Shop
115. Fisher, Alice
116. Fogarty, Janet
117. Fogarty, Peter
118. Frank, L.
119. Fucigna, Geoffrey W.
120. Fuentes, Carol and John
121. Gaeboz, Robert and Ruth
122. Garrison, Peter C.
123. Gartner, Debbie
124. Garver, Connie J. and Huthison, Mark
125. Geasland, Claudia
126. Genardini, Pia
127. Gevertz, Barry
128. Giannini, Laura and Robert
129. Gigi, Laura
130. Gipe, William
131. Gladstone, Victor W.
132. Golden Gate Clock House
133. Goldman, Christine
134. Gomery, Jane
135. Gonzales, Patricia
136. Green, C.
137. Gregory, Sylvia M.
138. Gullmes, Sherley
139. Herlihy, James A.
140. Henry Horn & Sons Insurance
141. Hills, Ernest H.

Individuals and Businesses (continued)

142. Hizazi, Helena W.
143. Holesapple, Georgette
144. Horn Family
145. Horn, Stan
146. Huening, Tom
147. Jarman, Jeanne
148. Jewel Cross, Nancy
149. Johnson, Neal
150. Joseph, Diane
151. Kaiser Permanente
152. Kaiser, Marina
153. Kaiser, Marina
154. Kehrlein, Charles
155. Kelly, James W.
156. Kochever, Roberta and William
157. Koll Real Estate Services Company
158. Kopatschek, Haydee
159. Koss, Diane M.
160. Krejewske, Grazyne
161. Lavaki, Emeline A.
162. Lawler, Sheila B.
163. Lawlor, Owen
164. Lazareto, Mila
165. Lewis, Tracy
166. Lighthouse Hotel
167. Matulich, Tish
168. Mazza, Hilda
169. Mccraney, Jim
170. Meckler, Al
171. Mendelson, Glenn
172. Michel, Arthur H.
173. Midson, Ramona and Bracker, Jessie
174. Millbrae Residents (475 People)
175. Miller, Norma
176. Mirta, Hassan
177. Miyashiro, Lois K.

Individuals and Businesses (continued)

178. Monaco, Daniel J.
179. Morse, Doris
180. Moyes, Jackie
181. Muzzi, Vincent A.
182. Neirby, Tamera
183. Nepote, Paul
184. Nielsen, Jean
185. Norton, Sonya
186. O'Mohony, Rosalie M.
187. Okken, Charles
188. Pacheco, Joe and Christine
189. Palmieri, Gail
190. Parker, Sherwood
191. Peninsula Temple Sholom
192. Pet World
193. Pincus, Melvin
194. Radebaugh, Gloria
195. Rasmussen, Henning C.
196. Rivasplata, Charles R.
197. Robbins, Dorothy
198. Romaine, Ann
199. Romaine, Ronald D.
200. Romino, Josephine
201. Ron Price Motors
202. Rosensweig, Teresa
203. Rosenthal, Leon E.
204. Russo, Susan and Ron
205. San Bruno Cleaners and Launderette
206. San Bruno Residents (6 People)
207. Saunders, Dolores
208. Schmidt, Alfred C.
209. Schonig, B.
210. Schulz, Timothy
211. Schwartz, Richard
212. Senkin, Jerome
213. Shankar, Vishnu

Individuals and Businesses (continued)

214. Silveira, W.M.
215. Sitike Counseling Center
216. Skinner, Joan
217. Slavick, Robert
218. Smith, Delancy
219. Smith, Susan M.
220. St. Bruno's Church
221. Stanford University Planning Office
222. Starkie Family
223. Stephens, Louise
224. Stockton, Robert C.
225. Studendorff, Frank and Nyla
226. Tillisch, Kathy & Michael
227. Town Cobbler Orthopedic Service
228. Treasure Island Motel & Trailer Court Corporation
229. Trevino, Sophia Lin
230. Ultimate Fly Shop
231. Oliveira, Mrs.
232. Unidentifiable
233. Unidentifiable
234. Veach, Marlene
235. Vincent, Doris O.
236. Voyager Travel
237. Waddell, Bob and Bernhardt, Kathy K.
238. Ward, Ethlyn
239. Ward, John P.
240. Welch, Joseph W. Jr. Real Estate
241. Wendel Rosen Black & Dean
242. Wheeler, Jim
243. White, George
244. Wolffe, Vaughn
245. Younge, Fitzroy
246. Yur Design, Inc.; Fraser, Sue and Hugh
247. Zalesky, Pauline
248. Zalesky, William
249. Zutraun, Hermann

Speakers

- S1. Alentiev, Tim (3/4/95)
- S2. Alesna, Lorraine (2/15/95)
- S3. Allen, Robert (2/15/95, 2/18/95, 3/4/95)
- S4. Amstrop, Irving (3/4/95)
- S5. Baker, Bill (2/15/95)
- S6. Bartalini, Jack (2/15/95, 2/18/95)
- S7. Becker, Todd (2/15/95)
- S8. Beckett, Jack (3/4/95)
- S9. Belknap, Erllys (3/4/95)
- S10. Bernard, Kathleen (2/15/95)
- S11. Bisson-Barnes, Alice (2/18/95)
- S12. Bracker, Jessie (2/18/95, 3/4/95)
- S13. Brun, Gottfried (2/18/95)
- S14. Bulsan, Consor (2/18/95)
- S15. Burke, Patricia (2/15/95, 2/18/95, 3/4/95)
- S16. Buschman, Scott (2/15/95, 3/4/95)
- S17. Caimotto, Joseph (3/4/95)
- S18. Cameron, Charlie (3/4/95)
- S19. Carter, Jeff (2/18/95, 3/4/95)
- S20. De Anda, Katharine (3/4/95)
- S21. Delander, Paul (2/15/95)
- S22. Dell'angela, Louis (2/15/95, 2/18/95)
- S23. Derenzi, Gary (2/15/95)
- S24. Deville, Denise (3/4/95)
- S25. Difilippo, Joe (2/15/95)
- S26. Drago, Jack (3/4/95)
- S27. Dreiling, Martin (2/15/95)
- S28. Edwards, Jeff, (3/4/95)
- S28.A Falsarella, John (3/4/95)
- S29. Fernekes, Joe (3/4/95)
- S30. Fogarty, Janet (3/4/95)
- S31. Fogarty, Peter (3/4/95)
- S32. Frank, L. (2/15/95)
- S33. Frate, Don (3/4/95)
- S34. Geasland, Richard (2/18/95)
- S35. Gil, Joan (2/18/95)

Speakers (continued)

S36. Giusto, Albino (3/4/95)
S37. Gonsolves, Maxine (3/4/95)
S38. Governale, Tony (3/4/95)
S39. Gregory, Sylvia (3/4/95)
S40. Gwathney, Margaret (2/15/95)
S41. Haas, James (3/4/95)
S42. Hills, Ernest (3/4/95)
S43. Hills, Rick (3/4/95)
S44. Holober, Richard (3/4/95)
S45. Hooper, John (2/18/95)
S46. Horn, Alan (2/15/95)
S47. Huo, Shue (3/4/95)
S48. Jewel Cross, Nancy (3/4/95)
S49. Johnson, Neal (2/18/95)
S50. Jordan, Gerhard (3/4/95)
S51. Keisling, Michael, (2/15/95, 2/18/95)
S52. Kelly, James W. Jr. (2/15/95, 3/4/95)
S53. King, Dwight (3/4/95)
S54. Knight, Marti (2/15/95)
S55. Kopp, Quentin Senator (3/4/95)
S56. Links, Bo (2/15/95)
S57. Loftis, Marilyn (2/15/95)
S58. Lyons, Larry (3/4/95)
S59. Machida, Eileen (2/18/95)
S60. Matalquin, Loardos (2/15/95)
S61. McIntosh, Teresa (2/15/95)
S62. McMahon, Joanne (3/4/95)
S63. McNamara, Dan (2/15/95)
S64. Mendelson, Glenn (2/15/95)
S65. Midson, Ramona (2/15/95)
S66. Mooney, John (2/15/95)
S67. Morales, Alberto (3/4/95)
S68. Morehouse, Lester (2/15/95)
S69. Morse, Doris (Mayor) (3/4/95)
S70. Nesbitt, Bryce (2/15/95)
S71. O'Mohony, Rosalie M. (3/4/95)

Speakers (continued)

S72. Pagliaro, Frank (2/18/95)
S73. Palafox, Josefina (2/15/95)
S74. Pallas, Chris (2/15/95)
S75. Parker, Sherwood (2/15/95)
S76. Peebles, Christian (2/15/95)
S76.A Philip, Karen (3/4/95)
S77. Pincus, Melvin (3/4/95)
S78. Piuton, Kalini (2/15/95)
S79. Richardson, Mina (2/15/95)
S80. Rogers, Elizabeth (3/4/95)
S81. Romaine, Ann (3/4/95)
S82. Romaine, Ronald D. (3/4/95)
S83. Sacco, Anthony (3/4/95)
S84. Schwartz, Richard (2/18/95, 3/4/95)
S85. Shoecraft, Don (3/4/95)
S86. Simon, Ed (3/4/95)
S87. Skinner, Joan (2/18/95)
S88. Skinner, Walter (2/18/95)
S89. Skjonsby, Dorothy (3/4/95)
S90. Spencer, Vonnie (3/4/95)
S91. Spinelli, Mike (3/4/95)
S92. Stockton, Robert (2/15/95)
S93. Stoll, Gerhard (3/4/95)
S94. Sweeney, Mike (3/4/95)
S95. Thomas, Owen (2/15/95)
S96. Torczyer, Jerome (2/15/95)
S97. Trapp, Onnolee (2/15/95)
S98. Triano, George (3/4/95)
S99. Urbach, Rose (2/18/95, 3/4/95)
S100. Valente, Norma (3/4/95)
S101. Van Pelt, Steve (2/18/95)
S102. Ward, John (3/4/95)
S103. Waxstein, Sam (2/15/95)
S104. Wayne, Alan (2/15/95)
S105. Wheeler, Jim (2/18/95)

Speakers (continued)

- S106. Williams, Matt (2/15/95)
S107. Wolfe, Vaughn (2/15/95, 2/18/95)

Additional Commentors

- A1. Caputo, Tito

Additional Commentors (continued)

- A.2 Fazio, Tony
A3. Nacamulli, Steven and Florence
A4. Nesbitt, Bryce
A5. Windfeldt, Edward W.

2.3 VOLUME III COMMENTORS

The following individuals submitted comments on the September 1995 FRDEIR/S#2DEIS. Responses to their comments are contained in Chapter 3 of this document.

Federal Agencies

1. U.S. Department of Commerce
2. U.S. Environmental Protection Agency
- A1. U.S. Department of Transportation,
Federal Aviation Administration

State Agencies

3. California State Department of Highway
Patrol, San Francisco Area
4. California State Department of
Transportation (Caltrans)

Local Agencies

5. City and County of San Francisco
Public Utilities Commission, Water
Department
6. City of Burlingame
7. City of Millbrae
8. City of San Bruno
9. Peninsula Corridor Joint Powers Board
10. Peninsula Corridor Joint Powers Board—
CAC
11. San Bruno Park School District
12. San Francisco International Airport
13. San Mateo County Transportation
Authority
14. San Mateo Union High School District

Organizations

15. Air Transport Association, #1
16. Air Transport Association, #2
17. Amalgamated Transit Union Local 192
18. Coalition for a One-Stop Terminal
19. Coalition of Colma Cemeteries
20. County Council Leagues of Women
Voters of San Mateo County
21. Golden Gate Audubon Society
22. Peninsula Rail 2000
23. Regional Alliance for Transit
24. San Bruno Citizens Coalition
25. San Francisco Planning and Urban
Research Association
26. Sierra Club
27. South Bay Historical Railroad Society

Individuals and Businesses

28. Abtelhalim, Suhail
29. Allen, Robert
30. Amstrup, Irv
31. Amstrup, Kay G.
32. Artichoke Joe's
33. Assad, Rafik
34. Belknap, Erlys

Individuals and Businesses (continued)

35. Bisson-Barnes, Alice
36. Bracker, Jessie
37. Brun, Gottfried
38. Cameron, Charlie
39. Caniglia, Lynne
40. Cook, Theresa
41. Dittmer, Debbie
42. Dorman, Lori
43. Fiorito, Pola
44. Gipe, William
45. Gorham, Wm. S.
46. Gwathney, Margaret
47. Harber, Maureen
48. Harrison Jr., William
49. Hills, Ernest H.
50. Hinman Skinner, Joan
51. Irwin, Jerome
52. Johnson, Neal
53. Kelly, James
54. Knudsen, Bob and Gretel
55. Livengood, Carolyn
56. Lockey, Bruce
57. Mangold, Sandra E.
58. Michel, Arthur H.
59. Millbrae Serra Convalescent Hospital
60. Nesbitt, Bryce
61. Oliphant, Howard
62. Pincus, Melvin S.
63. Riechel, Robert M.
64. Schwartz, Richard S.
65. Spencer, Vonnice
66. St. Bruno's Church
67. Stein, George and Stefani, Paul
68. Taylor, Kim
69. Vernon, Bruce
70. Ward, Lyn

Individuals and Businesses (continued)

71. Warner, Judy
72. Zutraun, Herman

Speakers

- S1. Allen, Robert
- S2. Amstrup, Irv
- S3. Bartalini, Jack
- S4. Bernard, Kathleen
- S5. Bisson-Barnes, Alice
- S6. Bracker, Jessie
- S7. Brun, Gottfried
- S8. Burke, Patricia
- S9. Buschman, Scott
- S10. Capodammo, Dan
- S11. Carter, Jeff
- S12. Church, Mark
- S13. Cook, Theresa
- S14. Crichton, Kyle
- S15. Dittmer, Debbie
- S16. Fogarty, Janet
- S17. Hargrave, Anthony
- S18. Harriman, Tom
- S19. Hendrickson, Ray
- S20. Hills, Ernie
- S21. Hons, Emile
- S22. Irwin, Jerome
- S23. Jacobberger, Jacqueline
- S24. Johnston, Bob
- S25. Kelly, Jim
- S26. Knight, Marti
- S27. Krips, R.
- S28. Lavulo, Lola
- S29. Links, Bo
- S30. Livengood, Carolyn
- S31. Lyons, Larry
- S32. Mallory, Brenda

Speakers (continued)

- S33. Mangold, Sandra
- S34. McIntosh, Teresa
- S35. Morse, Doris
- S36. Parker, Sherwood
- S37. Pincus, Melvin
- S38. Queen, Dehnert
- S39. Raiser, John
- S40. Ruggles, Stewart
- S41. Schmidt, Alfred
- S42. Schultz, Marcy
- S43. Schwartz, Richard
- S44. Simon, Ed
- S45. Spinelli, Mike
- S46. Steinberg, Marvin
- S47. Trapp, Onnolee
- S48. Twitchell, Jon
- S49. Ward, Lyn
- S50. Wheeler, Jim

Additional Commentors

- A1. U.S. Department of Transportation,
Federal Aviation Administration

Chapter 3

Responses to Comments

This chapter contains responses to written and oral comments received on the FRDEIR/S#2DEIS, released for public review in October 1995. Comments have been abstracted verbatim from the comment letter or from the public hearing transcripts and responses follow immediately after each comment.

3.1 FEDERAL AGENCIES

1. U.S. DEPARTMENT OF COMMERCE

- 1.1. If there are any planned activities which will disturb or destroy [geodetic control] monuments, NGS requires not less than 90 days' notification in advance of such activities in order to plan for their relocation. NGS recommends that funding for this project include the cost of any relocation(s) required.

Response. The locations of the NGS geodetic control monuments will be incorporated into the final design drawings. If the BART-San Francisco Airport Extension project disturbs or destroys any of these monuments, notification will be provided not less than 90 days in advance, and the project will include the cost of relocation(s).

2. U.S. ENVIRONMENTAL PROTECTION AGENCY

- 2.1. The SDEIS#2 is rated "2," Insufficient Information because the discussion regarding the amount of acres of wetlands that could be impacted is unclear.

Response. More detailed engineering design plans have been completed for those sites along the proposed project alignment that would unavoidably impact wetlands and other waters of the United States. The maximum total acreage projected to be permanently impacted by construction activities is approximately 1.16 acres. This information is presented in the Section 404 permit application Public Notice in Volume V of this FEIR/FEIS.

- 2.2. This EIS does not contain sufficient information to compare all of the alternatives with another. This lack of information also inhibits a full evaluation of the merits of each alternative. The FEIS should update all analyses and information reflecting any changes in the environment, community, and legal requirements in the project area, since the circulation of the original DEIS in 1992.

Response. Data from the 1992 AA/DEIR/DEIS were updated in the DEIR/SDEIS released January 1995. The DEIR/Technical Appendix includes a table that compares the acres of disturbed wetlands under each alternative (see Table 2.4-2, page 2-93). These acreages do not change with the additional consideration of the Aerial Design Option in the FRDEIR/S#2DEIS. Page ES-20 of the FRDEIR/S#2DEIS includes the portion of Table 2.4-2 from the DEIR/Technical Appendix dealing with biological impacts and also adds those effects of the Aerial Design Option. Volume I of this FEIR/FEIS updates the analysis and information related to environmental and community effects within the project area for the Locally Preferred Alternative (LPA). Please refer to Response 2.5 for a discussion of the scope of the FRDEIR/S#2DEIS.

- 2.3. We are also very concerned with the lack of clarity regarding a number of mitigation measures, particularly those relating to wetlands, traffic and intersection improvements, and air quality. We recommend that the FTA obtain written commitments from those parties who will provide approval,

access, or services for those mitigation measures to be carried out. FTA should describe any such commitments in the FEIS and include them in the Record of Decision (ROD).

Response. Subsequent to the publication of the FRDEIR/S#2DEIS, BART has continued to consult with the appropriate resource agencies and property owners relative to commitments to mitigation plans and sites. For details on the approved biological mitigation plans and commitments, please refer to the Biological Assessment, Biological Opinion from the USFWS, and attached letters from the San Francisco International Airport in Volume V of this FEIR/FEIS. These letters indicate SFIA's involvement in the regulatory agency-approved mitigation measures for the San Francisco garter snake and the California red-legged frog. BART will assume all management and maintenance responsibilities for the proposed wetland mitigation site in South San Francisco, as indicated in the proposed Wetland Mitigation Plan for the Section 404 permit in Volume V.

Traffic mitigation measures required to address significant traffic impacts will be included in the Mitigation Monitoring Report that will be adopted by the BART and SamTrans Boards of Directors prior to the Record of Decision. BART will enter into agreements with the local jurisdictions to contribute its fair share of the necessary improvements as required to address significant traffic impacts.

Regarding air quality, Section 3.10 of the DEIR/Technical Appendix and Section 3.10 of the FRDEIR/S#2DEIS, no significant air quality impacts would result from BART operations. Therefore, no mitigation measures are necessary to reduce air quality impacts associated with BART operations. Please refer to Responses 2.31 and 2.32 for further discussion of operational air quality impacts.

By contrast, Section 3.13 of the DEIR/Technical Appendix and Section 3.13 of the FRDEIR/S#2DEIS identify construction-related emissions of ozone precursors (oxides of nitrogen and reactive organic gases), carbon monoxide, nitrogen dioxide, and particulate matter that exceed the pertinent significance thresholds. Mitigation Measures 1.1 through 1.6, which are described on pages 3.13-198 through 3.13-200 of the DEIR/Technical Appendix, would minimize the construction-related emissions of these pollutants. Implementation of the prescribed mitigation measures will be required of construction contractors in the contract documents, and adherence to the measures will be monitored by BART as part of its Mitigation Monitoring Program.

- 2.4. In keeping with the [NEPA/404] MOU, the Final EIS must include: 1) a final alternatives analysis identifying the NEPA preferred alternative/§404 least environmentally damaging practicable alternative; 2) the final feasibility study of mitigation sites; 3) identification of the mitigation site location(s); and 4) a conceptual mitigation plan (refer to the Compensatory Mitigation Section of the MOU Guidance Papers). Additionally, other MOU requirements may also be applicable, e.g., §401 water quality certification.

Response. On April 27 and 28, 1995, BART and SamTrans boards selected Alternative VI, BART to Millbrae via the planned Airport International Terminal, as the new LPA. The U.S. Environmental Protection Agency (EPA), U.S. Fish and Wildlife Service (USFWS), and Army Corps of Engineers (ACOE) all provided BART with written preliminary agreement on this LPA as the least environmentally damaging practicable alternative (LEDPA). The selection of Alternative VI as the LPA is documented in more detail in the BART-San Francisco Airport Locally Preferred Alternative Report, May 1995. Consideration of other design options to Alternative VI to bring BART service into the SFIA was subsequently prompted by actions of the U.S. Congress, BART, and the San Francisco Airports Commission related to project costs and implementation of the 1989 SFIA Final Draft Master Plan. Details of these actions are defined and described in the FRDEIR/S#2DEIS, released in September 1995. On November 28, 1995, the BART and SamTrans boards identified the Aerial Design Option of Alternative VI as the new LPA, and deemed the original Alternative VI underground option economically infeasible and no longer practicable.

- 2.5. It would have been helpful if FTA and BART could have summarized the impacts from the northern portion of the alignment in this latest document, considering that the original document was distributed 3 years ago. Providing a summary of a summary of this information would have enabled us to better understand the scope of the project alternatives, and analyze and review all of the impacts from the whole alignment, rather than examine them in pieces.

Response. Impacts to the project alternatives as described in the Metropolitan Transportation Commission's 1992 AA/DEIR/DEIS were incorporated into the subsequent BART DEIR/SDEIS (January 1995) and were refined and updated in that document. The FRDEIR/S#2DEIS (September 1995) is a focused, supplemental environmental document that examines the aerial design option to one alternative analyzed in the DEIR/SDEIS. In an attempt to create a succinct document for a complex project, summaries of the DEIR/SDEIS were not included in the FRDEIR/S#2DEIS. A summary table of impacts for the entire alignment, however, is provided in the summary chapter of the FRDEIR/S#2DEIS.

- 2.6. We recommend that FTA address all of the cumulative and indirect impacts from spatially and temporarily related projects, including potential impacts that may be out of the direct control of FTA. The analysis of the cumulative impacts would include impacts from such projects as the additional route 101 on and off ramps to the airport, the proposed parking structures and any intersection or street modifications.

Response. Please refer to Responses 18.8 and 18.9 for a discussion of the cumulative analysis of the SFIA Master Plan and the BART–San Francisco Airport Extension. In this regard, meetings are ongoing with representatives from Caltrans, the City of Millbrae, the SFIA, the City/County Association of Governments of San Mateo County, and BART to specifically address the cumulative traffic volumes on Highway 101 and related ramps of the planned SFIA inbound/outbound ramps and the BART–San Francisco Airport Extension. Please also refer to Response 12.26 for discussion of the SFIA inbound/outbound ramp project.

- 2.7. FTA and BART should also consider any future mitigation measures that may have impacts that cumulatively with the project could be significant. These projects can be either underway or are planned to be implemented in the near future and will have impacts on air quality, erosion, urban runoff, and hazardous materials in excavated soils.

Response. Recognizing the concern for complete cumulative impact analysis, the DEIR/SDEIS and the FRDEIR/S#2DEIS address cumulative impacts, to the extent possible, for other projects in the area which are defined and committed for implementation in the near future. The presentation of mitigation measures in the DEIR/SDEIS and in the FRDEIR/S#2DEIS acknowledges potential effects of the mitigation measures. To provide detailed analysis on projects which may or may not be built and for which there is insufficient project definition, to determine potential impacts, is purely speculative. The National Environmental Policy Act (NEPA) as well as the California Environmental Quality Act (CEQA) discourage speculation and evaluation of impacts without sufficient basis.

- 2.8. The alternative VI multi-modal station and parking garage in Millbrae along with the proposed economic development of the area by the city of Millbrae, as mentioned in the SDEIS, may have significant impacts, particularly to air quality, traffic and transportation, as well as erosion, runoff, and construction impacts. The SDEIS#2 does not discuss any impacts to natural resources from the development of this facility or the planned induced growth.

Response. Cumulative traffic impacts have been discussed in the DEIR/SDEIS and the FRDEIR/S#2DEIS with regard to the BART Millbrae Avenue Station and proposed economic activities. Cumulative air quality analysis has been undertaken as part of the Transportation Improvement Program, which analyzes the project impacts in the regional context. Analysis of other impacts with regard to localized air quality, erosion, and construction impacts would be speculative, as

the future economic development plans in Millbrae are not well defined. No natural resources, such as wetlands, were identified for cumulative impacts in this area, as the station would be located within a previously developed site. The FEIR/FEIS contains discussions of cumulative and indirect impacts throughout the alignment for each environmental issue.

- 2.9. We recommend that the FEIS contain a section addressing cumulative and indirect impacts, particularly impacts stemming from induced growth throughout the alignment.

Response. The comment regarding the recommendation that the FEIS contain a section addressing cumulative and indirect impacts throughout the alignment is noted. Discussion of cumulative and indirect impacts is provided in Volume I of the FEIR/FEIS.

- 2.10. Guidance for Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters...for the entire portion of the BART alignment south of Angus Avenue. These guidelines should be referenced in the discussion of mitigation of the construction impacts, but the guidelines should also be implemented at transit stations, parking lots, and associated facilities.

Response. All BART build alternatives would generate short-term discharges during construction, as well as periodic stormwater discharges from impervious surfaces. Effluent from these sources that is released to navigable waters are regulated by the Clean Water Act and subject to certification or waiver under Section 401 of that statute. A water quality certification will be secured from the Regional Water Quality Control Board in conjunction with the 404 permit application (the U.S. Army Corps of Engineers has entered into a preliminary agreement with BART to issue a 404 permit). BART will also review and ensure compliance with applicable guidelines contained in the National Oceanic and Atmospheric Administration Guidance for Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters, pursuant to Section 6217 (g) of the Coastal Zone Reauthorization Amendments of 1990.

- 2.11. We recommend that FTA and BART include in the FEIS and the [Record of Decision] ROD, a description of management practices to minimize the effects of nonpoint source pollutants that will be generated from parking lots, the park-and-ride areas around transit stations, and at the transit stations themselves.....You may also wish to contact the Nonpoint Source Coordinator at the Regional Water Quality Control Board (RWQCB), regarding other appropriate management practices for your project area.

Response. Please refer to page 3.8-16 of the DEIR/Technical Appendix for a discussion of measures to mitigate nonpoint source pollution to insignificant levels. Oil and water separators will be installed in parking lot catch basins to separate contaminants from runoff entering the stormwater system. The effectiveness of these separators depends upon a high level of maintenance. BART will schedule regular maintenance of these separators before the beginning of each rainy season. Oil/water separators are generally effective at removing oils and large sediments; they do not, however, remove dissolved toxics or heavy metals that may be suspended in the stormwater runoff. The best way to control these compounds is by preventing them from entering the system. To reduce these pollutants, Best Management Practices will be applied, including regular sweeping of the parking areas, strict adherence to guidelines regarding application of fertilizers and pesticides in landscaped areas, and regular cleaning and maintenance of catch basins.

- 2.12. The DEIS does not indicate the difference between low quality and high quality wetlands and whether these areas are wetlands as defined by Section 404 of the CWA. We recommend that the FTA clarify in the FEIS, that these areas are jurisdictional wetlands and provide a table indicating the total amount of the waters of the U.S., wetlands, and habitat types that maybe impacted by the construction and implementation of the project.

Response. The DEIR/DEIS indicates that “low quality” wetlands are those wetlands that would require a replacement ratio of 1:1. “High quality” wetlands, such as those that support sensitive wildlife species on and in the immediate vicinity of the west of Bayshore parcel, are compensated for at a replacement ratio of 3:1. Those areas that qualify as waters of the United States (including wetlands), as defined by the ACOE, are identified and have been verified by the ACOE in the Wetlands Delineation Report and in the Section 404 permit application Public Notice (both included in Volume V of this FEIR/FEIS). The amount of jurisdictional area that would be permanently displaced is also identified in the Section 404 permit application Public Notice in Volume V. Unavoidable disturbances to the west of Bayshore parcel habitat for the endangered San Francisco garter snake and threatened California red-legged frog would total 10 to 12 acres of the 180-acre parcel.

- 2.13. We recommend that FTA select a construction lay-down area that has the least impacts to wetlands which, according to the document, would be either area A or area C.

Response. Minimization of wetland impacts is one of the primary concerns that will be considered in selecting a laydown area. Please refer to Response 8.31 for a general discussion of issues related to alternative laydown areas A, B, and C.

- 2.14. We...recommend that FTA consult with the USFWS when performing the geotechnical study of the area. FTA and BART should thoroughly examine minimizing and avoiding impacts from construction activities on the west of Bayshore parcel, such as limiting the number of geotechnical borings, and performing them within a short period of time.

Response. BART has prepared a Biological Assessment (BART, 1995) that addresses the geotechnical program. Interaction with USFWS personnel began September 29, 1995, when a letter was submitted to USFWS describing the proposed action, effects of the proposed action, and mitigation efforts associated with geotechnical testing operations on and near the west of Bayshore parcel. A site visit with USFWS on November 2, 1995 resulted in the modification of 20 geotechnical testing sites. In particular, eight borehole and six cone penetrometer tests were moved from a dirt roadway on the west of Bayshore parcel, and three soil borings were moved a short distance to minimize impacts to San Francisco garter snake (SFGS) hibernacula (areas where the snake might dwell in winter months).

Geotechnical testing is proposed to last approximately 28 days, weather permitting. The following mitigation measures will be implemented to minimize potential impacts to the snake:

- Implementation of a biological monitoring program;
- Vehicle access and speed limitations;
- Proper trash disposal; and
- Restoration of all test sites.

Additional measures are discussed in the Biological Assessment presented in Volume V of this FEIR/FEIS.

- 2.15. We recommend that the FTA and BART establish a mitigation plan and select a site for the mitigation activities based upon the existing biological conditions at the affected sites (Colma Creek, and West of Bayshore). Our preference would be for the selection of an West of Bayshore mitigation area.

Response. The USFWS and ACOE have been consulted to develop suitable mitigation plans for unavoidable impacts to the significant biological resources (e.g., wetlands and sensitive wildlife species) identified in the proposed project alignment. Please refer to the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS for more details on mitigation measures for the SFGS and red-legged frog. Also, please refer to the Proposed Mitigation Plan for the Section 404

permit in Volume V for details on the proposed wetland replacement mitigation measures along Colma Creek in South San Francisco.

- 2.16. We want to reemphasize that, FTA and BART must obtain preliminary agreement on the mitigation plan and implementation schedule from the signatory resource agencies, prior to circulating the FEIS. We encourage FTA and BART to obtain appropriate commitments from SFIA, allowing for the implementation of the mitigation measures as they are proposed in the DEIS and the two SDEISs.

Response. BART has secured preliminary agreement letters from the three signatory resource agencies involved with this project: U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, and the U.S. Fish and Wildlife Service. These letters are included in Volume V for the reader's review.

SFIA has provided BART a letter indicating its agreement in concept to those proposed mitigation measures on the west of Bayshore parcel (see the Biological Assessment in Volume V). BART will continue to work with SFIA to develop final agreements for those mitigation measures that require such agreements.

- 2.17. In the Final EIS, the Federal Transit Administration needs to demonstrate that the final preferred alternative is the least environmentally damaging practicable alternative in order to receive a §404 permit.

Response. Please refer to Response 21.5 for an analysis of the LEDPA.

- 2.18. The DEIS identifies the floodplain impacts from each alternative based on the criteria in 23 CFR 650 Subpart A, but does not indicate if the alternatives have prepared engineering design drawings that accommodate potential flooding impacts. Since a preferred alternative has not been selected, engineering design drawings should be prepared in accordance with EO 11988 once the preferred alternative is identified in the FEIS.

Response. Preparation of a hydrologic study and engineering design drawings have been initiated, in accordance with Executive Order 11988, for the preferred alternative identified in the FEIR/FEIS.

- 2.19. We recommend that the BART and FTA work closely with the residents of the immediate area of the BART alignment. FTA and BART should also ensure that the residents in the immediate neighborhoods have access to all public information relating to the planning and construction of the project.

Response. Chapter 8, Community Participation, in the DEIR/SDEIS contains a thorough discussion of community involvement activities, including public presentations, public open house events, and a public information hotline. This chapter is updated in Volume I of this FEIR/FEIS.

- 2.20. EPA is very concerned with the neighborhood impacts from the residential relocations due to the aerial option alignment alternative. We disagree with the statement in the SDEIS#2 that neither alternative VI or the aerial alignment options create disproportionate impacts on minority neighborhoods.

Response. Please refer to Response 16.53 regarding impacts on minority neighborhoods.

- 2.21. The January 1995, SDEIS (errata sheet) and the SDEIS#2 indicated that 202 households in the Millbrae Gardens neighborhood will have to be relocated and the proposed parking lot will accommodate 3,000 cars. However, under both alternatives IV and V, a parking lot at the Millbrae multi-modal station will only be 1,500 spaces. Neither the January SDEIS nor the SDEIS#2 provide a justification for a 3,000 space parking structure.

Response. Parking supply at the BART–San Francisco Airport Extension stations was designed for an average day, plus a 10 to 20 percent reserve for days that exceed the average. This percentage was increased slightly at end-of-the-line stations to reserve added capacity for days when demand is at its highest, such as when a traffic accident during the A.M. peak period causes diversion to BART. The modeled demand for parking spaces under the Aerial Design Option LPA as well as Alternative VI would be 2,220 spaces at the Millbrae Avenue Station in 2010, compared to 1,350 spaces under Alternative IV at the Millbrae Intermodal Station, and 2,020 spaces under Alternative V (also at the Millbrae Intermodal Station) in 2010. Under Alternative IV, the forecasted parking demand is 150 vehicles less than the number of parking spaces supplied at the Millbrae Intermodal Station. Under Alternative V, the forecasted parking demand is 520 more than the supply of parking spaces. The supply of parking spaces under both Alternatives IV and V would be constrained because expansion of parking supply would further encroach into the Marino Vista neighborhood, resulting in significant impacts. Please refer also to Response 2.22 for a discussion of the parking supply at the Millbrae Avenue Station.

- 2.22. We recommend that FTA provide justification for constructing a 3,000 space parking structure. In the spirit of Environmental Justice, FTA should examine alternatives to this structure of this size that would involve fewer relocations and less neighborhood disturbance. We would suggest that FTA examine the construction of a smaller structure with improved SamTrans bus service in the area, or another reasonable alternative.

Response. The parking requirements for 3,000 spaces at Millbrae Station have been developed using MTC patronage forecast models. Experience at other end-of-line stations in the current BART systems as well as major rail transit systems in other parts of the country indicate that adequate parking at the terminus is critical to the success of the system.

Even if the parking requirements could be reduced to some degree, the traffic, noise, and visual impacts on any remaining residential properties would be substantial. Furthermore, leaving a small portion of an existing residential area adjacent to a BART parking garage may be more detrimental to the quality of life than a complete displacement of the residential area. A reduced level of parking would still necessitate acquisition of the majority of the residential units due to the existing physical constraints of the available station site.

Increasing bus access to the site beyond the already substantial provisions in place for up to 12 bus positions would still require acquisition of portions of the residential neighborhood for internal circulation, loading/unloading, and access to and from the freeway and local streets.

- 2.23. The FEIS should identify the adverse effects on the neighborhoods due to the relocation of the residents and businesses. The FEIS should also indicate whether or not the analysis meets the requirements of the US Department of Transportation's Environmental Justice strategy.

Response. Relocation impacts are identified throughout the environmental justice analysis in Chapter 7 of the FRDEIR/S#2DEIS. Indeed, relocation impacts are accorded the most weight of any type of environmental justice impact (see page 7-2 of the FRDEIR/S#2DEIS). Furthermore, the Final Relocation Plan (FRP) included in Volume V, Technical Appendices, of this FEIR/FEIS, provides additional details regarding the basis for determining assistance and payment to all displaced households and businesses.

This analysis complies with the Department of Transportation's (DOT) Environmental Justice Strategy and is consistent with the methodology for evaluating environmental justice impacts in DOT's proposed order on environmental justice. Specifically, the analysis in the FRDEIR/S#2DEIS evaluates whether the project "is likely to have disproportionately high and adverse human health or environmental effects on low-income or minority populations." And, as part of this process, there has

been “appropriate and meaningful opportunities for comment by representatives of affected communities” (DOT, Environmental Justice Strategy, page 4 [June 6, 1995]).

- 2.24. We recommend that FTA coordinate and receive input from residents in the surrounding housing developments in the vicinity of the proposed project regarding the design and engineering of the noise mitigation actions.

Response. As with past projects, the project sponsors would mitigate noise with sound walls or other structural forms of mitigation, either affixed on BART structures or situated along the right-of-way, as well as trackwork designed to minimize noise and vibration. In general, aesthetics are taken into consideration during the design of sound walls and other noise mitigation. BART will explore the possibility of community input on the aesthetics of sound walls within the design-build construction process.

- 2.25. Also, we have a concern regarding noise walls and the impacts to wildlife movements along rail corridors and recommend FTA address this in the FEIS.

Response. It is unlikely the proposed noise wall on the west side of the CalTrain tracks will pose a significant barrier to wildlife movements. The remaining wildlife habitats west of the proposed sound wall would not be extensive nor contain any special habitat features that would attract wildlife from the west of Bayshore parcel. At this time, there do not appear to be any significant wildlife corridors between these two areas which are separated by the CalTrain tracks. Any terrestrial wildlife species would either have to cross the tracks in the open, or cross under the tracks in the existing culverts. Although some species that are highly adaptable to urbanized settings may utilize these routes, such as raccoons and opossums, it is unlikely that the sound wall would pose a significant barrier to these species, since the wall will be designed to allow for existing drainage routes in culvert extensions.

- 2.26. FTA should continue their early and close coordination with the city agencies to discuss the potential 4(f) parklands impacts. We encourage a discussion of parkland impact avoidance and recommend that FTA promote this issue as the alignment is designed in the preliminary engineering phase of the project.

Response: Close coordination with city agencies on the subject of potential 4(f) parkland impacts will continue throughout any preliminary engineering and development of the proposed project. The coordination that has occurred to date is documented in Volume I of the FEIR/FEIS.

- 2.27. The FEIS should include an update of all recent events regarding air quality in the Bay Area and any changes or amendments to the RTIP and the current conformity status of the Plan.

Response. The FEIR/FEIS includes a discussion of recent events regarding air quality in the Bay Area, including attainment of the federal ozone standard, changes and amendments to the Bay Area Regional Transportation Improvement Program (RTIP) and the Regional Transportation Plan (RTP), and the current conformity status of the *1982 Bay Area Air Quality Plan*. The following text changes are made to incorporate this information:

Page 3.10-3 of the DEIR/Technical Appendix, paragraph 2 is replaced with:

Ozone. In May 1995, the EPA approved the Bay Area Air Quality Management District’s (BAAQMD) November 1993 request for redesignation, so that the Bay Area was redesignated as an attainment area for the federal O₃ standard. The Bay Area is the largest metropolitan area in the United States to have achieved this distinction. However, the Bay Area remains designated as a nonattainment area for the state O₃ standard, which is more stringent than the federal standard.

The Bay Area Quality Management District (BAAQMD) is the local agency responsible for implementing state and federal air quality requirements. Responsibility for enforcement of federal requirements is the result of EPA approval of the 1982 *Bay Area Quality Plan* (1982 Plan), also known as the State Implementation Plan or SIP, which indicates how the BAAQMD will implement federal air quality requirements. The BAAQMD updated the 1982 Plan and adopted the *Bay Area 1991 Clean Air Plan* (BAAQMD, 1991) to implement the requirements of the California Clean Air Act of 1988. As required by the California Clean Air Act and subsequent 1992 amendments, the BAAQMD also prepared the *1994 Clean Air Plan Update* (BAAQMD, 1994). In connection with its September 1993 request for redesignation of the Bay Area as a federal ozone attainment area, the BAAQMD prepared and submitted to the EPA a *Maintenance Plan* describing how the Bay Area would maintain its attainment of the federal ozone standard. EPA approval of the redesignation request in May 1995 also approved the Maintenance Plan as part of the SIP. Since the 1982 Plan, as amended, and the Maintenance Plan constitute the federally approved SIP for the Bay Area, the conformity provisions of the 1990 Clean Air Act Amendments specify the conditions under which transportation plans, programs, and projects will be considered to conform to the 1982 Plan, the Maintenance Plan, and the Clean Air Act.

Page 3.10-4 of the DEIR/Technical Appendix, insert the following paragraph after paragraph one:

In November 1995, the MTC began the process of amending the TIP to specifically include the design concept and scope of the Alternative VI Aerial Design Option as the Locally Preferred Alternative and to program certain funding for the project. On February 28, 1996, the MTC amended the TIP to reflect these changes as well as a number of other new and revised projects. The MTC concurrently approved the *Supplemental Air Quality Conformity Assessment for 1995 TIP* (Supplemental Assessment). The Supplemental Assessment concludes that the amended TIP continues to conform to the Bay Area SIP. Further discussion of air quality and recent conformity decisions can be found in Volume 1 of the FEIR/FEIS.

- 2.28. The FEIS should include language that discusses that the new model [EMFAC7F] was used to examine the impacts of the proposed action on Ozone precursors, CO, and PM₁₀, pollutants. Given the Bay area's CO nonattainment status, and this past year's numerous exceedances of the ozone standard, the FEIS should have an up to date emissions analysis. EPA suggests that the FEIS indicate that the Air Quality analysis has been updated and provide any relevant data.

Response. As noted in the Air Quality Technical Report, Section 5.5.3, EMFAC7F Version 1.0 was the most recent EPA-approved vehicular emissions model at the time of the local carbon monoxide (CO) analysis (January 1994) and was therefore used to derive vehicular CO emission factors for the local analysis. As noted in the Air Quality Technical Report, Section 4.1.2, an error in EMFAC7F Version 1.0 required that the derivation of vehicular emission factors for the regional analysis be redone using the newer EMFAC7F Version 1.1, which was officially approved by the EPA in May 1994. On February 28, 1996, MTC approved the *Supplemental Air Quality Assessment for 1995 TIP* (Supplemental Assessment). The Supplemental Assessment concludes that the amended TIP, including the current LPA, conforms to the State Implementation Plan.

- 2.29. The DEIS, January SDEIS, and the SDEIS#2, indicate that there will be intersections operating at a LOS of D or worse by the year 2010. These intersections should be modeled using the current model for localized CO impacts, since they meet the 40 CFR 93.105 and 93.131 hotspot criteria. The results should be provided in the FEIS.

Response. The methodology employed in the selection of roadway intersections for microscale CO analysis is described in detail in Section 5.5.1 of the Air Quality Technical Report and is summarized in DEIR/SDEIS Response 20.105. The FRDEIR/S#2DEIS, Appendix Table B, identifies 17 roadway intersections with predicted levels of service of D or worse under the Alternative VI Aerial Design Option. Six of these intersections were *not* analyzed for local CO impacts. The rationale for excluding these intersections from the analysis is given below.

Intersection No. 5: Hickey Station Exit/Hickey Boulevard Extension. This intersection does not currently exist, but would be built under the Alternative VI Aerial Design Option. An “unsignalized” intersection (stop sign control on minor road only) was initially proposed at this location; however, the traffic analysis predicted a level of service (LOS) of F in the 1998 and 2010 P.M. peak traffic periods (as indicated in Appendix Table B). Based on that traffic analysis, an all-way-stop intersection is currently proposed, which would result in an acceptable LOS of C or better. Because the intersection LOS would be acceptable with the currently proposed all-way-stop design, Hickey Station Exit/Hickey Boulevard Extension was excluded from the local CO analysis.

Intersection No. 31: El Camino Real/Noor Avenue. This unsignalized intersection is predicted to be at LOS E in the 1993, 2000, and 2010 P.M. peak traffic periods (as indicated in Appendix Table B). However, the unacceptable LOS E designation is associated with the left-turn movement from El Camino Real to Noor Avenue, which involves a very small volume of traffic (only 46 vehicles per hour in the 1998 P.M. peak traffic hour). Additionally, three other signalized intersections with greater traffic volumes in the immediate vicinity of El Camino Real/Noor Avenue were already incorporated into the analysis: El Camino Real/South Spruce Avenue, El Camino Real/Sneath Lane, and Huntington Avenue/Sneath Lane. Because CO concentrations at El Camino Real/Noor Avenue would be lower than those at the three signalized intersections, El Camino Real/Noor Avenue was excluded from the local CO analysis.

Intersection No. 43: Huntington Avenue and Forest Lane. This intersection is currently an all-way-stop intersection, but would become an unsignalized intersection under the Aerial Design Option LPA. The intersection is predicted to be at LOS D in the 1993, 2000, and 2010 P.M. peak traffic periods under the Aerial Design Option LPA (as indicated in Appendix Table B). However, the unacceptable LOS D designation is associated with the left-turn movement from Forest Lane to Huntington Avenue, which involves a very small volume of traffic (only 54 vehicles per hour in the 1998 P.M. peak traffic hour). This left-turn movement would be greatly facilitated by the proposed traffic signals along Huntington Avenue to the north, an effect not considered in the LOS analysis of the intersection. Because very few vehicles would be queued at the intersection at any given time, CO concentrations in the vicinity of the intersection would be relatively low. Two other signalized intersections with greater traffic volumes in the immediate vicinity of Huntington Avenue/Forest Lane were already incorporated into the analysis: Huntington Avenue/Sneath Lane and San Mateo Avenue/San Bruno Avenue. Because CO concentrations at Huntington Avenue/Forest Lane would be lower than those at the two signalized intersections, Huntington Avenue/Forest Lane was excluded from the local CO analysis.

Intersection No. 61: San Mateo Avenue and Angus Avenue. Several roadway intersections in this area of the City of San Bruno, including San Mateo Avenue/Angus Avenue, were candidates for local CO analysis. Four intersections from this area were selected for analysis: 2nd Avenue/San Bruno Avenue, San Mateo Avenue/San Bruno, San Mateo Avenue/Huntington Avenue, and Huntington Avenue/Angus Avenue. Although the intersection of San Mateo Avenue and Angus Avenue is predicted to be at LOS D in the 2000 and 2010 P.M. peak traffic periods (as indicated in Appendix Table B), it was not selected for local CO analysis because it is an all-way-stop intersection with relatively low traffic volumes. In other words, the other four intersections were selected for local CO analysis over San Mateo Avenue/Angus Avenue because they are more likely to experience significant local CO impacts as a result of the project.

Intersection No. 162: Huntington Avenue and Tanforan Driveway North. This proposed unsignalized intersection would have provided access from Huntington Avenue to an existing surface parking lot with a previous Tanforan Station layout under Alternative VI and the Aerial Design Option LPA (see Figure 2.2-31 in the DEIR/Technical Appendix). However, the layout of the Tanforan Station has been revised and the intersection would no longer be built. Therefore, the intersection was not included in the local CO analysis.

Intersection No. 165: Huntington Avenue and Tanforan Driveway South. This unsignalized intersection is predicted to be at LOS D in the 1993, 2000, and 2010 P.M. peak traffic periods under the Aerial Design Option LPA (as indicated in Appendix Table B). However, the unacceptable LOS D designation is associated with the left-turn movement from the minor sidestreet ("Tanforan driveway south") to Huntington Avenue, which involves a very small volume of traffic (only 63 vehicles per hour in the 2010 P.M. peak traffic hour). This left-turn movement would be greatly facilitated by the proposed traffic signals along Huntington Avenue to the north, an effect not considered in the LOS analysis of the intersection. Because few vehicles would be queued at the intersection at any given time, CO concentrations in the vicinity of the intersection would be relatively low. Two other signalized intersections with greater traffic volumes in the immediate vicinity of Huntington Avenue/Forest Lane were already incorporated into the analysis: Huntington Avenue/Sneath Lane and San Mateo Avenue/San Bruno Avenue. Because CO concentrations at Huntington Avenue/Forest Lane would be lower than those at the two signalized intersections, Huntington Avenue/Forest Lane was excluded from the local CO analysis.

- 2.30. We recommend that the FEIS identify whether there are other affected intersections that should be included among those evaluated in the carbon monoxide microscale analysis and if there are going to be any mitigation measures at those intersections. We also recommend that microscale analysis be conducted for any intersection which is identified as one where, future adverse traffic impacts are likely to occur. Areas to the West of the project where there were projected increases in CO are candidates for additional microscale analysis.

Response. The FRDEIR/S#2DEIS, Chapter 3, Section 1.3 states that significant adverse traffic impacts to local intersections under the Alternative VI Aerial Design Option would be the same as those defined for Alternative VI in the DEIR/SDEIS, Chapter 3, Section 1.2 (with exceptions noted). As a result, local CO concentrations associated with the Alternative VI Aerial Design Option would be the same as those defined for Alternative VI in the DEIR/SDEIS, Chapter 3, Section 10.2. No other roadway intersections would experience significant local CO impacts under the Alternative VI Aerial Design Option. Please refer to Response 2.29 for additional information regarding selection of intersections for microscale CO analysis.

- 2.31. Mitigation measures proposed for minimizing air impacts at these intersections should include, commitments, funding, design and operations, and construction schedules. The SDEIS#2 does discuss some possible mitigation measures at particular intersections and along thorough-fares (pg. 3.1-13). We recommend that FTA indicate in the FEIS that these mitigation measures are possible and commitments from local governments have been obtained in order to proceed with these measures.

Response. The predicted adverse traffic impacts under the Alternative VI Aerial Design Option would not result in significant local air quality impacts. Predicted CO concentrations do not exceed federal or California 1-hour or 8-hour ambient air quality standards in any analysis year that the project would be in operation (1998, 2000, or 2010). Consequently, mitigation measures are not required for air quality purposes.

- 2.32. We strongly encourage FTA to examine opportunities for intersection mitigations other than lane widening, such as TSM traffic improvement measures.

Response. The DEIR/Technical Appendix proposed intersection mitigation measures in addition to lane widening. These measures, proposed to mitigate traffic impacts, can be found on page 3.1-125 and include Mitigation Measures 5.1, 5.2, and 5.3, i.e., all-way-stop control at Hickey Station exit and the Hickey Boulevard extension, restriping and traffic signal modification at Chestnut and Grand Avenues, and traffic signal improvements at El Camino Real and Sneath Lane. Please note that the latter measure also includes lane widening. These measures would also apply to the Aerial Design Option LPA. As explained in Response 2.31, measures were not proposed to mitigate roadway or intersection air quality impacts because the impacts would not be significant.

- 2.33. We encourage the project sponsor to include pollution prevention measures in the Final EIS for the project such as placing glass, aluminum and paper recycling receptacles and installing water/energy conserving devices at transit stations and using solar energy, where possible. We also encourage the project sponsors to develop pollution prevention plans for the construction activities.

Response. BART stations have instituted programs for recycling, with a focus on newspapers, which are often left on trains. Food and drink are not allowed in stations, and therefore no recycling facilities for the disposal of food and drink containers are established in stations. In terms of construction activities, BART has actively sought to meet environmental standards, such as stormwater pollution prevention and reduction in dust and other particulates during construction of other extensions. The Mitigation Monitoring Program will include reduction or minimization of pollution-generating activities during construction wherever possible.

A1. FEDERAL AVIATION ADMINISTRATION (Please refer to page III.3-273 later for comments and responses.)

3.2 STATE AGENCIES

3. CALIFORNIA DEPARTMENT OF HIGHWAY PATROL, SAN FRANCISCO AREA

- 3.1. Any extension of BART into the San Francisco International Airport (SFO) will have a positive impact on US 101 traffic volumes.

Response. As noted by the commentor, BART service would, overall, improve traffic conditions on Highway 101. This conclusion is supported by data in Table 3.1-93 of the DEIR/Technical Appendix.

- 3.2. Locally, there has been some controversy between BART, the SFO airport manager, and cities within the corridor regarding design options within the airport boundary. The CHP should not participate in any particular "on-airport" alternative/option.

Response. The commentor's discussion of the controversy surrounding the selection of the Alternative VI Aerial Design Option is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Section 1.2 of the FRDEIR/S#2DEIS, which explains why BART is pursuing an aerial alignment into the SFIA.

- 3.3. The Locally Preferred Alternative (LPA), as well as other alternatives evaluated in the past, include an aerial extension that will cross US 101 and the existing I-380 extension. It appears that regardless of the alternative or the "on-airport" option selected, the aerial extension will be the method of choice for crossing US 101.

Response. The 1992 LPA, Alternatives III, IV, V, V-A (aerial), V-B, and the Aerial Design Option LPA all include aerial alignments of either Airport Light Rail System (ALRS) or BART crossing over

Highway 101 connecting to the SFIA. However, Design Option V-A (subway) and the Alternative VI LPA tunnel include subway alignments under Highway 101 to the airport. Based on the environmental information in the FRDEIR/S#2DEIS and on a preliminary evaluation of comments received, on November 28 and 29 the BART and SamTrans boards modified the Alternative VI LPA, from south of Angus Avenue in San Bruno to the end of the tailtracks in Burlingame, to incorporate an aerial design option which crosses over Highway 101. The aerial extension to the “on-airport” station has several advantages, including but not limited to: (1) creation of views of the new International Terminal; (2) shorter construction duration than the tunneling alternative, and (3) more practical design and construction coordination of BART/SFIA structures.

- 3.4. San Francisco Area recommends that the final EIR address the participation of the CHP during the construction of the aerial portion across US 101. CHP participation should be limited to traffic control. CHP services will be provided on a reimbursable services basis. Providing these services will not have adverse impact on Area operations.

Response. Though the crossings of Highway 101 are proposed to be constructed by Airport contractors, the project proponents would recommend that the bid documents identify that the Highway Patrol is available to provide traffic control services on a reimbursable basis. Please also refer to Response 4.12 for a discussion of traffic management during construction.

4. CALIFORNIA DEPARTMENT OF TRANSPORTATION

- 4.1. Page ES-10, Table ES-2 - The alternatives indicate a degradation of Level Of Service (LOS) on US 101 and the project’s vicinity. The provision of a very large number of parking spaces (4,000 - 5,000, Table ES-1) for commuters appears to be the major cause of these impacts. Caltrans suggests consideration as a mitigation measure that parking facilities be substantially reduced in size, in combination with the provision of additional SamTrans feeder service to the new BART stations, and imposition of parking fees.

Response. The impact referred to on page 3.1-18 of the Summary DEIR/SDEIS was identified as significant and unavoidable. The access mode to BART extension stations was based on Metropolitan Transportation Commission’s (MTC) mode choice model. Use of this regionally approved model is required by the FTA. The end-of-the-line BART station in the City of Millbrae under Alternative VI and the Alternative VI Aerial Design Option was modeled with a high level of bus feeder service as well as connections with CalTrain to minimize the need for automobile access to this station. In addition, these transit feeder services were deliberately set at service levels to match the MTC model forecast demand. The resulting feeder service to the Millbrae Avenue BART Station exceeds feeder service that is supplied to any other BART station. Additional bus feeder services would not substantially increase bus patronage based on the modeling analysis and it also would not meet fare box recovery ratios mandated by state regulations.

The imposition of parking fees is suggested as a method of reducing freeway traffic by discouraging people from driving to the transit station. Parking fees would result in some persons no longer using BART, instead reverting to another transit mode or back to driving rather than using transit. The net effect of whether a parking fee at BART extension stations would reduce or add vehicles to Highway 101 would require remodeling the mode choice estimates.

- 4.2. Page 1-5, second and third paragraphs under San Francisco Airports Commission Action and Chapter 2, page 2-1, last paragraph under Project Description on Passenger Service Quality Standards - this document mentions convenient connection between BART and Airport Light Rail System but it does not mention provision of adequate space for luggage. Will BART redesign its cars to incorporate features that are most consistent with the Quality Standards as far as domestic and international airline passengers are concerned?

Response. Scheduled level of service and on-board baggage facilities are policy decisions that will be addressed by the BART and SamTrans Boards of Directors prior to the beginning of revenue service.

The initial BART cars did not have bicycle accommodations, but actual usage and bicycling enthusiasts convinced BART that such accommodations were necessary. The last car on BART trains is used for this purpose. In addition, BART installed bicycle lockers at each station. The current BART fleet has 150 "C" flat nosed lead cars. "C" cars are equipped with an operator's compartment, automatic train operating equipment and communications system (as in the slant nosed "A" cars) and can function as a lead, middle or trailing car. BART will monitor the baggage load on trains. The "C" car seats 64 passengers as compared to 72 for the "A" and "B" cars. Because the "C" car has 8 fewer seats than either the "A" or "B" cars, there is approximately 100 square feet more passenger floorspace that could be used for luggage. Please refer to Response 53.2 for additional discussion of luggage accommodation on BART.

- 4.3. Page 2-13 - paragraph under Millbrae Avenue Station discusses moving the existing CalTrain station building and tracks approximately 12 feet to the west (shown on Figure 6, page 8 of Design Appendix). This is a National Register property....Section 4, Cultural Resources, page 3.4-1 does not include a discussion of impacts of this relocation of the Millbrae CalTrain Station.

Response. Page 3.4-1, paragraph two, sentence one, Section 4.2, of the FRDEIR/S#2DEIS states that "The Aerial Design Option...would result in impacts identical to those described for Alternative VI Tunnel in Section 4.2, of the Summary DEIR/SDEIS, except for one difference," that difference being the altered setting of the house at 540 San Antonio Avenue in San Bruno, a property potentially eligible for inclusion in the National Register of Historic Places. Relocation of the Millbrae Avenue Station is discussed in paragraph one, sentence two, page 3.4-8 of the Summary DEIR/SDEIS and in greater detail under Impact 8 on page 3.4-34 of the DEIR/Technical Appendix.

Since publication of the DEIR/SDEIS in January 1995 and the FRDEIR/S#2DEIS in September 1995, BART has continued to assess the need to move the Millbrae CalTrain Station from its current location. It has been determined that it would not be necessary to move the station under the Aerial Design Option LPA. Therefore an adverse effect to this NRHP-listed building would not occur and no further discussion of impacts is needed. Please refer to Response 13.23 for the comments on the DEIR/DEIS and to Response 4.5 below for a discussion of the revised plans for the Millbrae CalTrain station.

- 4.4. In Chapter 5, Section 4(f) Evaluation, reference is made to Alternative VI in the DEIR/SDEIS as having the same impacts as the Aerial Design Option.

Response. Chapter 5, Section 4(f) Evaluation, states that existing parks that may qualify for protection under Section 4(f) are the same for Alternative VI as for the Aerial Design Option (see page 5-2 of the FRDEIR/S#2DEIS). Chapter 5 also explains that Lion's Field Park may experience "constructive" use during project construction, resulting from use of one of three proposed alternative contractor laydown areas adjacent to the park. Specifically, use of the Alternative A laydown area may result in a noise and visual intrusion that would interfere with use of the park during the 45-month construction period. Under Alternative VI, a possible "take" of Lion's Field Park would occur due to closure of the park for approximately nine months during construction (see page 5-16 of the DEIR/Technical Appendix).

- 4.5. Table 3.4-1, page 3.4-9, the impact to historic properties has not been adequately evaluated in compliance with Section 106 of the National Historic Preservation Act. The specific terminology under Section 106, Effect, No Effect or Adverse Effect, should be used.

Response. Specific Section 106 terminology has been included in Section 3.4, Cultural Resources in Volume I of this FEIR/FEIS and takes into account the SHPO's Finding of Effect report which can be found in Volume V of this FEIR/FEIS. Research conducted since the publication of the DEIR/SDEIS

in January 1995 led to the elimination of some of the cultural resources listed on Table 3.4-1 from the new table, either because the resource was found not to be eligible for the National Register of Historic Places (NRHP) (601-605 San Mateo Avenue; 609-617 San Mateo Avenue; American Legion Post; and the Old Water Quality Building), or because reanalysis showed that the resource was outside the area of potential effects (United Airlines Hangar and Millbrae Train Station).

Five cemeteries comprise four individual districts that appear to qualify for the NRHP. Each cemetery makes up a separate district, except that the Home of Peace Cemetery and Hills of Eternity Memorial Park are considered one district based upon their physical proximity and historical and aesthetic unity. No permanent impacts to the qualities that make these properties eligible for inclusion in the NRHP would occur, and a finding of “no effect” has been determined, pursuant to Section 106 criteria, for the four districts.

The Salem Memorial Park Office Building qualifies for the NRHP under Criterion C of the National Register. The area around the building may be used as a temporary construction laydown area. Once construction is completed, the setting would be restored to its original condition, and there would be “no effect” on this building.

The Lagomarsino Farm District consists of five houses and one farm building related to the Lagomarsino vegetable farm on Mission Road in Colma. This district was determined to be ineligible for the National Register by the SHPO. The BART tracks would be moved closer to this historic district, but because this district has been adjacent to a railroad track since its establishment, there would be “no effect.”

BART plans to temporarily remove the arched, cut-stone bridge associated with the old San Francisco-San Jose Railroad. The bridge would be reassembled in its original location following completion of construction. Nonetheless, this temporary removal would result in an “adverse effect” because the “integrity of workmanship, materials, feeling, and association” would be affected.

The Aerial Design Option LPA (LPA) would introduce a new visual element into the setting of 540 San Antonio Avenue in San Bruno. However, the change would not significantly alter the character of the property’s setting, and a determination of “no effect” was therefore made.

Based on further engineering studies the Millbrae Train Station, a National Register-listed property, would not have to be moved as part of the project. The building is not dependent upon its setting, including the platform location, for its National Register listing.

With development of the station, the platform center for both BART and CalTrain passenger loading would be located approximately 650 feet north of the existing Millbrae Train Station. The existing CalTrain platform used in conjunction with the historic station would be shifted north to be integrated with the new BART station. As a result, the southernmost edge of the platform would be approximately 200 feet north of the historic station instead of the center of the platform being located in front of the station.

Page 3.4-34, paragraph three, of the DEIR/Technical Appendix is modified as follows:

Based on additional engineering performed in this segment, the Millbrae Railroad Station would not need to be relocated ~~would be moved 15 feet west of its present location to~~ accommodate the BART and CalTrain tracks. The building is on the National Register, and relocation ~~of the platform to the Millbrae BART Station is not considered~~ would be a significant effect ~~pursuant to Section 106 and CEQA (Appendices G and K) criteria~~.

The train station would not be moved approximately 15 feet west of its present location to accommodate the BART rail tracks, but the station platform would be shifted 650 feet northward to the Millbrae Avenue BART Station. This would result in the south end of the platform being located approximately 200 feet north of the station.

Page 5-24 of the Summary DEIR/SDEIS, paragraph two, is replaced by the following:

Planning and Mitigation Measures. No mitigation is needed for this site, as the Millbrae train station will not be relocated.

- 4.6. The impacts to historical properties are not addressed in compliance with CEQA and the California Register. AB 2882 amended CEQA (PRC 21084.1) to read "A project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment."

Response. Direct and indirect disturbances to historic properties within the area of potential effects have been evaluated under both Section 106 and California Environmental Quality Act (CEQA) criteria in the DEIR/SDEIS. Please refer to Response 4.5 for further details regarding historic properties.

- 4.7. The lead agency for this project must complete a determination of effects as prescribed by Section 106 of the National Historic Preservation Act (36 CFR Part 800) and incorporate that information in the FEIS for this project. Alternatives considered in both Supplemental #1 and #2 have the potential to affect this historic property [i.e., the Millbrae CalTrain station].

Response. A Finding of Effect report, as required by Section 106, has been prepared and is included in Volume V, Technical Appendices of the FEIR/FEIS. Please refer to Response 4.5 for a discussion of the revised plans for the Millbrae CalTrain station.

- 4.8. The 4(f) discussion in the FEIS will need to reflect the conclusion of the effects determination. On page ES-2 - The project elements need to be evaluated for their potential effects. These include the relocation of the building away from the tracks, the end of its use as a depot, and isolation from its rail line setting by a series of developments in the area, culminating with the sound wall proposed for construction along the western edge of the CalTrain right-of-way south of Murchison Drive.

Response. A summary of the Finding of Effect (FOE) report is presented in the Cultural Resources section of Volume I of this FEIR/FEIS. The FOE itself and correspondence from SHPO are presented in Volume V, Technical Appendices, of this FEIR/FEIS. Pursuant to Section 106 of the National Historic Preservation Act, this documentation evaluates the potential effects described by the commentator that relate to the Millbrae CalTrain Station.

- 4.9. Page 3.1-9, item 4, last paragraph - This document assumes that CalTrain riders from the south will take BART at Millbrae to reach the Airport. Please note that the Peninsula Corridor Joint Powers Board (PCJPB) has recently considered a new CalTrain Airport Station on the west side of US101 across from the airport. The Airport Light Rail System (ALRS) could be extended to the new CalTrain Airport Station. Please provide comparative analysis of how BART ridership would be affected by the new CalTrain Airport Station.

Response. The Peninsula Corridor Joint Powers Board (JPB) is currently considering various alternatives to extend the proposed Airport Light Rail System (ALRS) to a CalTrain station in the vicinity of the SFIA. The alternatives for detailed analysis have not been determined, analysis of these

alternatives have not been performed, and recommendations by the JPB resulting from such analysis have not been made. Therefore, given that there is no detailed information from this JPB study to analyze, it would be speculative to analyze the impacts of extending the ALRS to a "new CalTrain Airport Station." A direct connection between CalTrain and the ALRS was thoroughly examined in the DEIR/SDEIS, as it was included in all of the BART build alternatives (except for the Alternative VI LPA and the Aerial Design Option LPA). For example, Table 3.1- 8, Daily Trips by Mode to the San Francisco International Airport (SFIA), in the DEIR/Technical Appendix, indicates the number of CalTrain riders traveling to and from the SFIA whether by the ALRS or by BART. CalTrain ridership to and from the SFIA is highest under the TSM Alternative at 5,700 riders in 2010, and among the BART build alternatives is highest under the 1992 LPA and Alternatives III, IV, and V, which all have 5,500 riders with a direct connection between CalTrain and the ALRS. Alternative VI, which includes a connection between CalTrain and BART for access to the SFIA, has 5,400 CalTrain riders in 2010. In addition, please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- 4.10. Page 3.1-12, middle of the page, "with the Adrian Road connection, some drivers destined for southbound 101 may turn south onto Rollins Road and enter US101 at the Broadway Interchange...." Diverted traffic needs to be quantified and included in the analysis of the Rollins Road/Broadway intersection as well as the Broadway/US 101 on and off-ramp intersection.

Response. Compared to the No Build Alternative in 2010, Rollins Road in Burlingame in the vicinity of Millbrae Avenue Station would carry an estimated additional 120 vehicles northbound during the A.M. peak hour under the Alternative VI LPA and the Aerial Design Option LPA, and an additional 50 southbound vehicles during the P.M. peak hour, compared to the No Build Alternative in 2010. The revised Millbrae Avenue Station design plan as described in the FRDEIR/S#2DEIS includes a new exit to Adrian Road. With this new connection, an additional 15 cars would travel southbound on Rollins Road and an additional 80 vehicles would travel northbound on Rollins and turn right onto Millbrae Avenue during the P.M. peak hour. These increases in traffic volumes would not create significant traffic impacts along Rollins Road south of Adrian Road.

The BART extension under Alternative VI would have minimal impact on the Broadway Interchange with Highway 101. The sub-area traffic model indicated that, in the area of the Broadway Interchange for Highway 101, the net change in traffic movements under the Alternative VI LPA and the Aerial Design Option LPA would be primarily northbound and southbound trips on Rollins Road with approximately 120 vehicles northbound crossing Broadway in the A.M. peak hour and 50 vehicles southbound in the P.M. peak hour. This additional traffic would not cause a significant impact at the intersection of Broadway and Rollins Road. The model forecast that most of these BART-destined vehicles would travel on Rollins Road south of Broadway rather than using the ramps of the Broadway Interchange. The BART-related vehicles on the Broadway Interchange ramps were ten or fewer vehicles according to the sub-area traffic model under Alternative VI and the Aerial Design Option LPA in 2010 and would not significantly affect the level of service on these ramps. The model also revealed that BART-destined vehicles on Highway 101 would stay on the freeway near the Broadway Interchange and exit the freeway at the Millbrae Interchange.

The intersection of Rollins Road and Broadway was analyzed under the Alternative VI LPA and the Aerial Design Option LPA. The BART extension under these two alternatives would not add a significant amount of traffic to this intersection. The addition of BART-related vehicles to southbound movement on Rollins through its intersection with Broadway would not adversely affect intersection operations, because this movement is not the critical movement that constrains the capacity of this intersection.

- 4.11. Page 3.1-14, item 3.1 - The northbound 101 to westbound Millbrae loop off-ramp is to be eliminated as the mitigation measure for this project. Is this proposal in accordance with the braided on/off-ramp system for northbound 101 between Millbrae Avenue and San Francisco International Airport (SFIA)

as proposed in the SFIA Expansion Project? Have other alternatives, such as eliminating eastbound Millbrae Avenue to northbound 101 loop on-ramp, been examined? The impact by BART to the Millbrae Avenue Interchange with US101 should be mitigated.

Response. The proposed elimination of the northbound ramp from Highway 101 to westbound Millbrae Avenue loop off-ramp would not interfere with the proposed SFIA expansion plan to braid the Millbrae Avenue northbound on-ramp with the SFIA northbound exit.

The elimination of the eastbound Millbrae Avenue ramp to the northbound Highway 101 loop on-ramp would have both advantages and disadvantages. One advantage of this alternative plan is that preservation of the northbound ramp from Highway 101 to westbound Millbrae Avenue loop off-ramp would remove the possibility of interchange traffic from the northbound off-ramp backing up and interfering with traffic on the collector-distributor road serving the Millbrae Avenue interchange. A disadvantage of this alternative plan is that the elimination of the eastbound Millbrae Avenue ramp to the northbound Highway 101 loop on-ramp would force eastbound traffic to turn left at a new intersection of Millbrae Avenue and the northbound diagonal on-ramp. Queuing from the eastbound left turn movement at this intersection may require that the Millbrae Avenue overpass be widened. This widening would make this option too expensive compared to the option of eliminating the northbound loop off-ramp, as described on pages 3.1-13 and 3.1-14 of the FRDEIR/S#2DEIS. Please also refer to Response 7.4 for a discussion of mitigating impacts to the Millbrae Avenue Interchange.

- 4.12. Page 3.13-6 to 3.13-14 - Please describe the impact and duration of the construction of BART aerial structures over mainline US 101 and the proposed mitigation. We suggest that a Traffic Management Plan (TMP) for construction movements be considered. Any proposed construction staging, shoulder or lane closures, temporary traffic lane striping, lane encroachment, and any other work zone traffic control within State right-of-way shall be coordinated with Caltrans, prior to the beginning of work.

Response. As stated on page 3.13-6 of the FRDEIR/S#2DEIS, the aerial portion of the alignment within the Highway 101 right-of-way would be constructed in a traditional fashion, concurrent with the construction of new highway ramps into and out of the SFIA as called for by the SFIA Master Plan. The FRDEIR/S#2DEIS notes that the existing number of highway lanes will be maintained except during the actual placement of prefabricated girders spanning the highway. Construction of the girders for the Highway 101 crossing would be performed between 11:30 P.M. and 4:30 A.M. to minimize impacts on peak-hour freeway travel and airport access. (Note that the restricted hours would only apply to construction operations on the freeway, such as the erection of the foundation and columns as well as falsework beams across the freeway. After falsework is erected, traffic below could flow freely.) The FRDEIR/S#2DEIS estimates four nights for the placement of girders (two nights for the girders spanning the northbound lanes and two nights for the girders spanning the southbound lanes). The construction schedule of the aerial structures over Highway 101 would be refined during final engineering and coordinated with SFIA improvements. The portions of the BART Aerial Design Option located east of the western right-of-way of Highway 101 are to be designed and constructed by SFIA, in order to avoid delay to proposed SFIA Master Plan projects.

Coordination with Caltrans would occur during the design and construction of the aerial structures over Highway 101, and Traffic Management Plans would be developed jointly with Caltrans, SFIA, and the local communities, as appropriate. Construction work above the falsework decking could be performed during normal daylight construction hours. To avoid multiple traffic disruptions, BART and SFIA would coordinate their construction schedules and Highway 101 traffic management plans, which may include measures such as temporary rerouting (this would require coordination among Caltrans, SFIA, City of San Bruno, City of Millbrae, and BART).

- 4.13. Access to the proposed temporary storage yard and staging area (Alternatives A, B and C, Figure 3.13-3) from a temporary on- and off-ramp (via an existing Caltrans road along the westerly side of

US101/San Bruno Avenue Interchange) is not a viable option. This will create confusion for the traveling public at the proposed off-ramp and a weaving problem at the proposed on-ramp.

Response. Caltrans, BART, and the affected local cities will coordinate to develop a plan that would redirect construction traffic from city streets to Highway 101 by creating a construction access road along Highway 101 to the construction site. As stated on page 3.13-14 of the FRDEIR/S#2DEIS, under Alternative B, the yard and staging area could be feasibly accessed by a new temporary road connecting to the existing Caltrans road along the westerly side of Highway 101. The existing road has ample area along the west side for the construction of temporary deceleration and acceleration lanes. Proper signage and traffic control would lessen confusion to the traveling public and would prevent their use of the access road.

- 4.14. This report should use 2020 traffic projection since the FHWA/FTA require 20-year horizon analysis for geometric design of new facilities affecting state highways.

Response. The forecasts of transit patronage, mode choice for access, and traffic impacts were based on the regionally approved MTC travel demand model. At the time MTC staff performed this study, the available horizon year was 2010. The year 2010 data allow for analysis of transportation impacts under "buildout" conditions, when new patterns of travel affected by the project have been well established. Forecasts of future transportation conditions are based on socioeconomic projections of population and employment. The nature of these projections becomes more uncertain as the forecasts are projected farther into the future.

- 4.15. Figure 2-12, page 2-16 - The direction orientation of this cross-section is reversed when compared to the proposed plan in Figure 2-11, page 2-15.

Response. The commentor is correct in noting that the direction orientation of the cross-section of the proposed Millbrae Avenue BART/CalTrain Station in Figure 2-12 of the FRDEIR/S#2DEIS is reversed. Figure 2-12 on page 2-16 of the FRDEIR/S#2DEIS is amended as follows:

The words "EAST" and "WEST" will be reversed in Figure 2-12.

- 4.16. Caltrans expects that negotiations between BART and San Francisco International Airport would produce an agreement resulting in the preservation/protection of all species of concern and critical habitat present on the west of...Bayshore parcel and on other affected areas of the project.

Response. BART has consulted with the USFWS and developed a mitigation program for the SFGS and California red-legged frog and their habitats on the west of Bayshore parcel. This program was developed USFWS as part of the Section 7 consultation process. The mitigation program is presented in the Biological Assessment (BA) and Biological Opinion (BO) in Volume V of this FEIR/FEIS. Chapter 3 of the BA summarizes the consultation process BART, SamTrans, and Federal Transit Administration (FTA) completed with the USFWS.

The BA also contains written correspondence from the SFIA indicating its agreement in concept with the proposed mitigation measures. BART is now working with the SFIA to finalize an agreement relative to those mitigation measures identified in the BA and BO that deal with proposed habitat enhancement measures on the west of Bayshore parcel.

- 4.17. Appendix Table B - Several intersections were identified to be significantly impacted by this project, with projected LOS E or worse in either AM or PM peak, namely:

#5 Hickey Sta. Exit & Hickey Ext'n

#34 El Camino Real & Sneath

#72 El Camino Real & Millbrae

However, discussion and mitigation proposal was only made for intersection #72. Please note that intersection #34 is located on a major state highway.

Response. On page 3.1-12 of the FRDEIR/S#2DEIS, it states that "Significant adverse traffic impacts to local intersections under the Aerial Design Option (either Option B or X) would also be the same as those defined for Alternative VI in Chapter 3, Section 1.2 of the DEIR/SDEIS, except as noted below." The mitigations for the intersections of Hickey Station exit/Hickey Boulevard Extension and El Camino Real/Sneath are included on page 3.1-160 of the DEIR/Technical Appendix. The mitigation measure at intersection #5, Hickey Station exit/Hickey Boulevard Extension would be all-way stop signs. The mitigation for intersection #34, El Camino Real/Sneath, is to provide additional lanes on all approaches, including additional exclusive left turn lanes on Sneath Lane, so that existing split signal phasing may be removed. Traffic impacts and improvements at intersection #162, Huntington/Tanforan Driveway North are described on pages 3.1-160 and 3.1-161 of the DEIR/Technical Appendix. The revised Tanforan Station Concept Plan would remove the Huntington Avenue and Tanforan Driveway North intersection under Alternative VI and the Aerial Design Option LPA, thereby eliminating this traffic impact. The revised plan for the Tanforan Station is included in Volume IV of the FEIR/FEIS.

3.3 LOCAL AGENCIES

5. CITY AND COUNTY OF SAN FRANCISCO PUBLIC UTILITIES COMMISSION, WATER DEPARTMENT

- 5.1. All legends, on the above drawings, should be consistent utilizing either SFWD or CCSFWD, but not both.

Response. All legends for the plans and profiles are revised to be consistent with San Francisco Water Department (SFWD) property lines (see Volume IV of this FEIR/FEIS).

- 5.2. All plan and profile drawings should identify San Francisco Water Department [SFWD] property lines.

Response. All SFWD property lines are identified on plan and cross-sectional drawings (see Volume IV of this FEIR/FEIS).

6. CITY OF BURLINGAME

- 6.1. On page 1-2 of the September, 1995 draft EIR/EIS one of the reasons given for the selection of Alternative VI is that it had the greatest community support. Although it mentions the support was conditioned, the nature and significance of the conditions were not. For example, if a condition of support is that there be a bored tunnel through San Bruno, what is the cost of meeting that condition and how does that change cost effectiveness? If there is no bored tunnel through San Bruno, does the local support remain?

Response. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) at the close of the public comment period for the DEIR/SDEIS. The Alternative VI LPA calls for the undergrounding of BART through the City of San Bruno, using the cut-and-cover method of construction. As described in Response 24.1, Alternative VI with a bored tunnel configuration through the City of San Bruno was considered as a possible option to the cut-and-cover construction method. However, Response 24.1 presents four reasons the bored tunnel option is

not feasible, including an estimated increase in cost of approximately \$25 million compared to the cut-and-cover method.

- 6.2. The report should include expressions of opposition and concern from other public agencies. The concerns expressed go far beyond the very short list of areas of controversy on page 4-3 which includes only CalTrain connectivity and biological issues. The list also should include issues related to transportation and traffic, land use and economic activity, finance and environmental justice.

Response. The commentor is correct in stating that expressions of opposition and concern from public agencies should be included in the environmental documentation. The 45-day public comment period for the FRDEIR/S#2DEIS lasted from October 6, 1995 to November 20, 1995, and a public hearing was held on November 16, 1995. The purpose of the comment period and public hearing was to facilitate the expression of public sentiment regarding the evaluation of the new LPA, Alternative VI, in the FRDEIR/S#2DEIS. Many statements of opposition and concern were received from public agencies during the comment period.

The focused analysis contained in the FRDEIR/S#2DEIS concentrates solely on the environmental concerns related to the Alternative VI Aerial Design Option, from south of Angus Avenue in San Bruno to the end of the tailtracks in Burlingame. The DEIR/Technical Appendix contains the environmental analysis for the remainder of the proposed BART–San Francisco Airport Extension alignment, including the Alternative VI Tunnel Option. The areas of controversy listed in the FRDEIR/S#2DEIS pertain only to the area of the alignment within the boundaries mentioned above. Analysis of the other environmental issues mentioned by the commentor is contained in the DEIR/Technical Appendix.

- 6.3. Options B and X are not really alternatives and they make up the wye option or project. They are compared to Alternative VI Tunnel as if that were an alternative but if it were feasible, the wye option would not be needed....There should be alternative methods of achieving the project objectives at an acceptable cost. The analysis is deficient in the absence of alternatives.

Response. As described in Sections 1.2 and 1.3 of the FRDEIR/S#2DEIS, the FRDEIR/S#2DEIS was prepared only to consider the Aerial Design Option of bringing BART service into the airport. Design Options B and X analyze only a portion of the Alternative VI LPA, from Angus Avenue in San Bruno to the end of the tailtracks in Burlingame. The FRDEIR/S#2DEIS does not evaluate the segment of the Alternative VI LPA between the Colma BART Station and Angus Avenue in San Bruno. As such, Design Options B and X are only a segment of the larger Alternative VI. For this reason, CEQA and NEPA allow the FRDEIR/S#2DEIS environmental analysis to focus only on the differences between the options and Alternative VI. Thus, the FRDEIR/S#2DEIS addresses only significant new or different impacts of the Aerial Design Option and compares them to those of the Alternative VI tunnel alignment into the airport south of Angus Avenue.

Table ES-2, Comparison of Key Impacts, in the FRDEIR/S#2DEIS compares Alternative VI with the Aerial Design Option and the other alternatives evaluated in the DEIR/SDEIS. Thus, Table ES-2 compares each alternative/design option for the entire project corridor from the Colma tailtracks to the Burlingame tailtracks.

Furthermore, the FRDEIR/S#2DEIS is a continuation of the 1992 AA/DEIS/DEIR and the 1995 DEIR/SDEIS and analyses two design options in a long list of alternatives and design options previously studied in these two earlier documents. The overall BART–San Francisco Airport Extension environmental analysis has an extensive range of alternatives and design options, as documented in Section 2.5 of the DEIR/Technical Appendix.

- 6.4. One alternative that should be considered would have BART terminate at the Airport....The connection between BART and CalTrain could be at a location further north.

Response. Two of the alternatives evaluated in the AA/DEIS/DEIR were #4 - BART to Airport Internal and #6 - Airport Internal via I-380. Both of these alternatives included an airport internal station underneath the center of the airport short-term parking garage, terminating in a subway tailtrack south of the airport terminal area. Alternatives 4 and 6 also included a Tanforan Station, which was linked to a new San Bruno CalTrain near Scott Street by a shuttle bus.

At the conclusion of the Alternatives Analysis study, BART, SamTrans, and the Metropolitan Transportation Commission (MTC) chose BART to Airport External via I-380 as the 1992 LPA. Alternatives 4 and 6 were not selected as the LPA by the BART and SamTrans Boards of Directors and the MTC in 1992, and are not under consideration in the current DEIR/SDEIS.

- 6.5. Vertical alignment of the extension would have the main line descending into subway south of the Airport (page ES-2) and ascending again to the Millbrae Station. Would it be feasible to remain below grade at the station and the tailtrack? Remaining below grade may be more consistent with a future extension of BART or electrification of CalTrain, both of which would require grade separation at Broadway.

Response. A subway station and tailtracks at Millbrae Station were considered, but were removed from consideration due to the increased construction cost. At-grade tracks at Millbrae Avenue would not preclude a future BART extension to the south on the west side of the CalTrain tracks and a grade separation at Broadway of both BART and CalTrain.

- 6.6. A general concern is about the adequacy of the MTC travel demand forecasts for 1990 and 2010 upon which the transportation impact analysis is based. The methodology description in the January, 1995 draft EIR/Supplemental Draft EIS (page 3.1-9) contains a number of caveats about the model that suggest that the results may be only a general indication. The September draft is based on the same model. It is not wise to build a billion dollar system upon a foundation of what may be weak and flawed assumptions. It would seem to be prudent to update the forecasts with current data and project a greater time in the future in order to facilitate a reasonable decision. The current wye proposal and Millbrae Station were not factors in earlier studies. Travel demand forecast, particularly of Airport patrons and employees should be updated.

Response. No reservations are held about use of MTC's mode choice model. Federal law requires use of the regionally accepted travel demand model, which includes the mode choice model. The Transportation Technical Report of the DEIR/SDEIS provides more details on the assumptions and methodology used to develop the traffic forecasts for the project's baseline year of 1993 than are contained in the Summary DEIR/SDEIS and the DEIR/Technical Appendix. Specifically, details on assumptions and methodology can be found in Section 2.1, Metropolitan Transportation Commission Mode-Choice and Highway Model Projections, on pages 6 to 16 and in Section 2.4, Traffic Projections, on pages 29 to 48 of the Transportation Technical Report.

- 6.7. Effectiveness of BART to the Airport is questionable in view of the high capital and operating costs. Table 3.1-5 shows auto trips to the Airport remaining at about 86% through 2010 while BART trips remain at about 5%. There should be more effective and economical methods, such as TSM, to reduce auto trips to the Airport.

Response. The cost-effectiveness index, as prescribed by the Federal Transit Administration, is presented in Table 6-7 of the FRDEIR/S#2DEIS. Table 6-7 includes this estimate for each of the BART build alternatives and is based on comparisons to the TSM Alternative, which means that the cost-effectiveness index for the TSM Alternative cannot be included. The number of daily auto trips to and from the San Francisco International Airport (SFIA) in 2010 is forecast to be 213,400 trips under the No Build Alternative, 207,700 trips under TSM, 203,100 trips under the Alternative VI LPA, and 203,300 trips under the Aerial Design Option LPA. These reductions in daily auto trips to the SFIA

under the BART build alternatives are just one of the objectives of the BART–San Francisco Airport Extension.

- 6.8. CalTrain extension in Downtown San Francisco is not adequately discussed as an alternative to the BART extension to the Airport. A fair analysis of the comparative effectiveness of BART and an extended CalTrain may show that CalTrain would carry more new patrons than BART at substantially less costs; and with far less disruption of established communities.

Response. In 1995, the Peninsula Corridor Joint Powers Board (JPB) initiated a *CalTrain San Francisco Downtown Extension Project Draft Environmental Impact Statement/Report*. The JPB met in January 1996 to refine its proposal to extend CalTrain into downtown San Francisco. Based on information contained in the Design Options Screening Report, which was released for public review last October, the JPB dropped the Market/Beale Station alternative from further consideration, citing technical problems, community impacts, and higher costs. The Transbay Terminal Station site alternative with a series of options and the No Build are currently under environmental review. The DEIS/DEIR is scheduled for public circulation and comment in the Fall of 1996.

MTC's New Rail Starts and Extensions Program (Resolution No. 1876) identifies the BART extension and CalTrain extension to downtown San Francisco as top regional priorities. The CalTrain extension is an active proposal. The funding principles underlying the financing plan for the CalTrain extension to downtown San Francisco and upgrades are summarized in MTC Resolution No. 1876. The resolution, updated on February 27, 1991, proposes \$226.7 million in funding from San Mateo County's 1/2 cent sales tax; \$232.2 million in combined funding from San Francisco, San Mateo, and Santa Clara counties; \$146.2 million in federal Section 3 Rail Modernization funds; and \$29 million from the State of California. The CalTrain federal rail funding is targeted for CalTrain upgrades and the extension to downtown San Francisco. CalTrain's funds will be derived from Rail Modernization funds, while BART's proposed SFIA extension would use New Starts funding. The funds are discrete, are not interchangeable, and cannot be transferred from one project to the other.

The impacts of the BART extension with and without the CalTrain downtown extension in San Francisco were described in the 1992 AA/DEIS/DEIR, which is a predecessor document of the DEIR/SDEIS. At the time the DEIR/SDEIS was completed, the CalTrain downtown extension was a highly speculative project. No environmental documentation was initiated and no funding had been identified. Additional analysis is not warranted and is made difficult because the CalTrain terminus has not been finalized and may be moved as a result of the new MTC CalTrain Relocation Study. During preparation of the DEIR/SDEIS, the Federal Transit Administration (FTA) was consulted and concurred that the DEIR/SDEIS did not need to reincorporate information of a CalTrain downtown extension already presented in the AA/DEIS/DEIR. Furthermore, the exclusion of CalTrain resulted in conservative traffic impacts for the BART extension because BART patronage, including those persons accessing stations by auto, would be greater without the CalTrain downtown extension, as indicated in the AA/DEIS/DEIR.

The AA/DEIS/DEIR examined the differences in patronage and transfers on the relevant transit systems with and without the CalTrain downtown extension. Total BART boardings decreased by approximately 4 percent with the CalTrain downtown extension. Total CalTrain boardings under the BART build alternatives increased by 24 percent with the downtown extension.

According to the AA/DEIS/DEIR, BART would have a total of 399,500 boardings under the Base Case Alternative in the year 2010 without the CalTrain downtown extension, compared to 383,700 boardings with the CalTrain extension in the same year. Without the CalTrain downtown extension, there would be 42,600 more boardings on BART under the Base Case Alternative in 2010; with the CalTrain extension, the increased boardings on BART would be 26,800.

According to the AA/DEIS/DEIR, CalTrain would have 46,600 boardings under the Base Case Alternative in 2010 without the downtown extension, compared to 57,700 with this extension. In terms of a net change in CalTrain ridership, boardings increase by 8,300 without the downtown extension, compared to 19,400 boardings in 2010 with this extension. As presented in the AA/DEIS/DEIR, the increase in CalTrain boardings from the No Build Alternative is greater under the TSM Alternative: boardings increase by 11,200 without the downtown extension and by 28,800 boardings with the downtown extension.

The underlying assumptions used in MTC's travel demand model in the AA/DEIS/DEIR remained the same when MTC performed additional modeling analysis for the DEIR/SDEIS. The definitions of the 1992 LPA and the Base Case Alternative were identical in the two documents. Using the patronage forecasts for the Base Case Alternative in both studies as the basis for comparison, simplified estimates of BART and CalTrain patronage with the CalTrain downtown extension can be made for BART build alternatives that were not included in the 1992 AA/DEIS/DEIR study. For example, total BART boardings under Alternative IV in 2010 are 399,800, as reported in the DEIR/SDEIS. These would decrease to approximately 384,000 boardings under the same BART alternative with the CalTrain downtown extension, based on the change in boardings under the Base Case Alternative with and without the CalTrain downtown extension (that is, 399,500 boardings is to 383,700 boardings under the Base Case Alternative with and without the downtown extension, as 399,800 boardings is to 384,000 boardings under Alternative IV with and without the downtown extension). The number of boardings under Alternative IV with the CalTrain downtown extension is not based on new analysis but represents an approximation based on the original analysis in the AA/DEIS/DEIR. This simple method of comparison can be used because the underlying assumptions for modeling the Base Case Alternative in the AA/DEIS/DEIR are the same as those used to model Alternative IV, as well as Alternative V, Design Options V-A and V-B, and Alternative VI, in the DEIR/SDEIS.

The FRDEIR/S#2DEIS contains tables and text addressing BART and CalTrain boardings with and without the CalTrain downtown extension under the Alternative VI Aerial Design Option. For example, Table 3.1-2 in the FRDEIR/S#2DEIS indicates that BART boardings under Aerial Design Option X in 2010 decrease from 401,400 boardings without the CalTrain downtown extension to 385,500 boardings with the extension. A similar method was used to estimate transfers between BART, CalTrain, and the proposed ALRS under the Aerial Design Option.

An exception to this method of factoring based on Alternative 3A and 3B in the AA/DEIS/DEIR was made for the BART-CalTrain transfers under the Aerial Design Option. The CalTrain downtown extension would affect transit patronage to and from downtown San Francisco, but it would not affect the number of CalTrain riders in San Mateo County going into and out of the SFIA. Under the Aerial Design Option in 2010, 5,200 CalTrain riders from south of the SFIA are estimated to travel to and from the SFIA, with BART providing the only direct rail access to the SFIA. These riders were subtracted from the 24,200 transfers between BART and CalTrain under the Aerial Design Option before the factoring was applied, because the CalTrain downtown extension would not affect their destination choice of the SFIA. Once the factoring was performed, these 5,200 CalTrain riders were added back to the number of transfers between BART and CalTrain to arrive at the 11,800 transfers under the Alternative VI Aerial Design Option with the CalTrain downtown extension.

- 6.9. The draft EIR/EIS does not explain the effects on CalTrain of the transfer to BART. Also, what is the basis for the assumed number of transfers? What is the projection for the level of continued CalTrain service to San Francisco?

Response. The number of transfers between CalTrain and BART is based on MTC's mode choice model that is federally approved for making these forecasts. One of the modeling assumptions in the DEIR/SDEIS is that CalTrain would be operating 86 trains per day with 43 trains in each direction between San Jose and San Francisco. This number of trains is based on equilibration of MTC's model-generated ridership. The number of CalTrain train trips was not varied between the BART

build alternatives and the TSM alternative in order to identify the effects of the various project alternatives. Therefore, non-BART-related elements of the transit network were held constant. The results of MTC model forecasts revealed that CalTrain ridership north of the BART-CalTrain intermodal station would decrease significantly. Please refer to Response 9.20 for further discussion of CalTrain ridership north and south of the BART-CalTrain transfer station.

Another model assumption was that CalTrain operated all of its trains to its terminus in San Francisco and would not terminate service at the BART-CalTrain intermodal station. The JPB would need to determine any other adjustments to CalTrain service.

- 6.10. A majority of SFIA employees commute from the south. Improved shuttle service and other incentives would enable CalTrain to serve an increased number of persons working at the Airport.

Response. MTC performed the BART patronage forecasts as well as estimates of mode of access, i.e., transit, auto, or walking. Table 3.1-1 on page 3.1-3 in the DEIR/Technical Appendix, SFIA Airline Passenger and Employee Origins Percent Distribution, presents the modeling assumptions used for the location of air passengers and employees traveling to the SFIA. This table indicates that 56.4 percent of SFIA employees live south of the Airport, 34.8 percent of resident airline passengers live south of the SFIA, and 28.6 percent of non-resident airline passengers travel from south of the Airport. MTC's forecasts included estimates of transit patronage to the SFIA by work trips, non-work trips, and air passengers. MTC supplemented their forecast with more detailed mode choice modeling on access to the SFIA.

The BART build alternatives as well as the TSM Alternative include rail service between a CalTrain station and the SFIA that would not be available under the No Build Alternative. Under Alternative VI and the Aerial Design Option, this improved shuttle service between CalTrain and the Airport would be provided by BART service while under the other BART build alternatives and the TSM Alternative this service would be provided by the proposed ALRS. CalTrain would provide 700 trips to SFIA under the No Build Alternative in the year 2010, while the BART build alternatives and the TSM Alternative would provide over 5,000 trips in 2010. Please also refer to Response 4.9 for a discussion of the ridership differences in CalTrain trips to SFIA among the build alternatives.

- 6.11. The BART alignment to Downtown San Francisco is about ten miles longer than the extended CalTrain which could offer much shorter travel times than the 44 minutes projected for BART.

Response. According to the current CalTrain schedule, service between Millbrae and the Fourth/Townsend terminus takes 29 minutes on a local train and 25 minutes on an express train during the A.M. peak period. The scheduled BART travel time between Civic Center in San Francisco and the Millbrae Avenue Station would be 27.5 minutes under Alternative VI and 26 minutes under the Alternative VI Aerial Design Option. The travel time from the Civic Center BART Station and the Montgomery Street BART Station would add another three minutes to these travel times. Travel time estimates from the corner of Montgomery and Market Streets to the SFIA terminals are 42 minutes under Alternative VI and 46 minutes under CalTrain with a new terminus at Beale and Market Streets. Montgomery and Market Street is the epicenter of commuter travel to downtown San Francisco. Moving the origin point to favor CalTrain at the proposed terminus of Beale and Market Streets, the BART travel time increases to 43 minutes and the CalTrain travel time decreases to 38 minutes.

- 6.12. The realignment of CalTrain tracks (Plan and Profile Figure 6) to accommodate the tailtrack in Burlingame raises a question about the effect of the realignment on a future railroad grade separation at Broadway. This issue should be addressed.

Response. As discussed in Response 6.5, at-grade tailtracks in Millbrae would not preclude a future BART extension to the south. This is true for tailtracks in Burlingame as well.

- 6.13. Freight service exists in Burlingame via a railroad spur. It is not clear if this service will continue with the BART tail track to Burlingame.

Response. Presently, the drill track is embargoed from use by SPTCo. Discussions with the JPB have indicated that installation of necessary switching at this location would conflict with operating criteria for CalTrain. If or when the drill track were placed into service before construction of the BART–San Francisco Airport Extension begins, the rail spur would need to be altered to allow freight service and avoid a significant impact.

- 6.14. SamTrans bus routes may be altered or changed; in what way? To what extent will express busses to San Francisco remain with the BART extension?

Response. The MTC model assumed local bus routes would provide feeder service into BART extension stations and certain mainline and express bus routes would have longer headways than the current schedule. For example, bus route 5L, mainline service serving El Camino Real, would be reduced from the current 15-minute headway to 20-minute headways with the BART build alternatives. Another example involving service to south San Mateo county residences is that service on the 7B SamTrans route, which serves Redwood City to the SFIA using arterial streets and then to San Francisco partially using the freeway, was reduced from 5-minute headways to 20-minute headways in the model. The load factor, the ratio of occupied to available seats, would remain the same on these routes compared to the No Build condition because some previous bus patrons would access BART stations via CalTrain or automobile. The impact to SamTrans service in the coastal areas would not change under any of the alternatives analyzed in the DEIR/SDEIS. Changes in SamTrans service to the coastal residences would occur with the opening of the Colma BART Station rather than with any of the proposed BART extension stations. Any changes to SamTrans routes must first be proposed and then discussed in public hearings held by SamTrans before such changes would be implemented.

A full report on the modeling assumptions for SamTrans bus service was included in the Final Definitions of Alternatives, Task 5, Deliverable 7, published in August 1991 by MTC. This report was part of the AA/DEIS/DEIR, and includes maps of the changes in SamTrans bus routes assumed for estimating transit patronage. Although this report was prepared for the AA/DEIS/DEIR, the same assumptions apply to the alternatives in the DEIR/SDEIS, except that the bus routes serving the Airport Intermodal Station would be shifted south to serve the Millbrae Intermodal Station under Alternatives IV and V or to service the Millbrae Avenue Station under Alternative VI and the Alternative VI Aerial Design Option.

- 6.15. Millbrae Station modal changes should be addressed. As an end of the line BART station, information should be shown on the types of transfer: auto to BART, auto to CalTrain, auto to Airport Shuttle, CalTrain to BART, bus to BART, bus to CalTrain, bus to shuttle, etc.

Response. The DEIR/SDEIS includes information on the transfer activity between BART and the other modes included in the comment. The volumes shown in the entries and exits tables in Appendix B for every alternative analyzed include all transfers to BART from each of the other access modes. Revisions to Table B-40, Alternative VI BART Station Entries and Exits, are presented in Response 8.12 of Volume II of this FEIR/FEIS. The volumes for the Aerial Design Option LPA are included in Appendix Table A, Alternative VI Aerial Design Option BART Station Entries and Exits by Access Mode and Trip Purpose, of the FRDEIR/S#2DEIS. The auto rows in Appendix Table A under the Millbrae Avenue Station include the person trips by automobile to the Millbrae Avenue Station, including individuals who park and ride BART plus persons who are dropped off or are picked up at the Station. Table 3.1-7, Daily Intermodal Transfers Between Rail Services, in the FRDEIR/S#2DEIS provides the volume of transfers between BART and CalTrain which would occur at the Millbrae Avenue Station under the Aerial Design Option LPA. The number of CalTrain riders using BART to access SFIA are contained in Table 3.1-5, Daily Trips by Mode to the SFIA, in the FRDEIR/S#2DEIS

in the CalTrain rows. If "Airport Shuttle" in the comment refers to the ALRS, then please note that the ALRS would not extend to the Millbrae Avenue Station under the Aerial Design Option, and no auto drivers would transfer to the ALRS. If the ALRS were extended to the Millbrae Avenue Station as part of a separate project, then auto drivers destined for the ALRS would not be allowed to park in BART parking spaces. Please refer to Response 9.9 for further discussion of air passenger parking at BART stations. The other request volumes, including auto to CalTrain, bus to CalTrain, and bus to ALRS are not included. As stated previously, the Millbrae Avenue Station under the Aerial Design Option LPA would not include the ALRS. The transfer activity for the other two transfers (auto to CalTrain, bus to CalTrain) would be relatively minor, between 100 and 200 daily transfers for the two combined, compared to BART-related activity.

- 6.16. Highway 101 impacts between SFIA and 3rd Avenue (page 3.1-31 January draft) are neither adequately addressed nor mitigated. There is no description of the effects on freeway interchanges to the south. The analysis does not address the effects on parallel routes when drivers seek alternatives to escape the congestion of service levels E and F. There could be a potential for significant adverse effects and need for mitigation of those effects at the following locations in or near Burlingame: El Camino Real, Old Bayshore, Bayshore Boulevard, Interstate 280, Trousdale, Murchison Drive, Broadway, Peninsula Avenue.

Response. The impacts of BART-related traffic to Highway 101 between the SFIA and 3rd Avenue are addressed in the FRDEIR/S#2DEIS as well as in the DEIR/SDEIS. For example, freeway impacts are summarized for the year 1998 on pages 3.1-107 and 3.1-109 and in Table 3.1-74, Freeway Level of Service - 1998, in the DEIR/Technical Appendix. All of the potentially significantly affected intersections in Burlingame are included in the FRDEIR/S#2DEIS and the DEIR/SDEIS, including intersections along El Camino Real, Trousdale Avenue, Murchison Avenue, Rollins Road, and Broadway Avenue. These intersections were listed in Table 3.1-70 of the DEIR/Technical Appendix and include Broadway/Rollins listed as intersection number 135, Broadway/California is intersection 134, Broadway/El Camino Real is 133, Trousdale/El Camino Real is 130, Murchison/El Camino Real is 127, Millbrae Avenue/El Camino Real is 72 and Millbrae Avenue/Rollins is listed as number 80. The level of service for these intersections as well as the other intersections analyzed are contained in Appendix B of the DEIR/Technical Appendix. Specifically Tables B-3, B-7 and B-13 contain all intersections analyzed for all alternatives for analysis years 1993, 1998 and 2010, respectively. The traffic sub-area model assignments indicated that less than 10 BART-related vehicles would use Peninsula Avenue during the A.M. or P.M. peak hours and that fewer than 100 would use I-280 during the A.M. or P.M. peak hours. In both cases, these volumes would not create significant traffic impacts in Burlingame. The traffic modeling performed for analyzing impacts in the BART extension DEIR/SDEIS included roadways to the east of Highway 101, i.e., Bayshore Highway, according to the travel assignments performed to determine specific routes taken.

- 6.17. Broadway-Rollins Road traffic volumes would increase but the level of service would remain acceptable, according to page 3.1-12. The intersection currently appears to be barely acceptable, and is difficult at best with its proximity to the CalTrain tracks, the Highway 101 interchange and California Drive. This intersection has a high accident rate which would increase with more traffic.

Response. Please refer to Response 4.10 for a discussion of impacts at the intersection of Broadway and Rollins.

- 6.18. There is a concern that the extension of Adrian Road as an outlet for the Millbrae Station parking (page 3.1-12) would encourage southbound traffic to go south on Rollins Road rather than turn north to Millbrae Avenue to get to Highway 101. Although drivers may meet congestion at Rollins-Broadway, they may be tempted to avoid the inconvenience of a left turn into the visible congestion at Millbrae Avenue and then enter additional congestion on Highway 101. It is felt that there would be an adverse effect on Rollins-Broadway and mitigation should be required.

Response. Please refer to Response 4.10 for a discussion of impacts at the intersections of Broadway/Rollins Road and Rollins/Adrian.

- 6.19. Rollins Road/Millbrae Avenue intersection is a primary access to the Millsdale Industrial Area in Burlingame; the only other access is Rollins/Broadway. Congestion at Millbrae Avenue already exists and as it increases the problem at Broadway also will increase. This issue requires analysis and mitigation.

Response. A substantial number of vehicles would be added to the background traffic at the Millbrae/Rollins intersection under Alternative VI. "Background traffic" refers to the growth in traffic between the 1993 No Build Alternative, which represents current conditions, and a future year No Build Alternative, which would include growth in traffic from sources not related to the BART extension. A significant traffic impact would not occur because this intersection would be substantially improved by proposed BART design features that would increase traffic capacity at this location. Specifically, two lanes are proposed to be added to westbound Millbrae Avenue, one lane to eastbound Millbrae Avenue, one lane to northbound Rollins Road, and two lanes to southbound Rollins Road.

- 6.20. California Drive will be extended northerly under the new Millbrae Avenue grade separation. There is reference to an extended Victoria, in Millbrae, which would be connected to a new BART garage (page 3.1-13). This garage is not shown on the Millbrae Station sketch (Figure 2-11) and is neither explained nor included in parking totals. Additional information and analysis are required.

Response. References to extending California Drive to Victoria and construction of a new parking garage west of the railroad right-of-way refer to improvements that have been separately suggested by the City of Millbrae and submitted to BART for consideration as part of the Millbrae Station project. BART has not included these improvements as part of the project because they are an aspect of the City of Millbrae's preliminary redevelopment plans and are not directly connected with or impacted by the BART extension.

BART has agreed to make a contribution to any future improvements that may be undertaken by the City of Millbrae based on the required traffic mitigations to the El Camino Real/Millbrae Avenue intersection. Please also refer to Mitigation Measure 2.1 on page 3.1-13 of the FRDEIR/S#2DEIS.

- 6.21. El Camino Real-Millbrae Avenue mitigation 2.1 (page 3.1-13) is vague and unclear, although it sounds like a major improvement at substantial cost. There is reference to creating an additional eastbound lane. Does this mean widening the overpass and taking additional property along Millbrae Avenue? The mitigation seems to be qualified by the improvement being made in a reasonable period of time.

Response. The potential upgrade to the intersection of El Camino Real and Millbrae would be a major improvement that would involve substantial cost. As stated on page 3.1-13 of the FRDEIR/S#2DEIS, the plan to widen the east leg of Millbrae Avenue at this intersection would involve both land and a business acquisition, as well as retrofitting the Millbrae Avenue overpass. Millbrae Avenue would be widened from El Camino Real to Rollins Road to create one additional eastbound leg. This proposal would improve the traffic operations to an acceptable level of service in the analysis year 2010, with the Millbrae Avenue Station under the Alternative VI LPA or the Aerial Design Option LPA. The contribution by the BART-San Francisco Airport Extension project to the City of Millbrae would be based on this improvement to Millbrae Avenue, but recognition is given that the City of Millbrae may have different plans to reduce traffic congestion at the intersection of El Camino Real and Millbrae Avenue.

- 6.22. Does an impact such as this remain unmitigated if not totally funded by BART and no other source of funding is available?

Response. BART intends to pay for the mitigation described in Response 6.21. If the City of Millbrae undertakes a different project at this intersection, the amount required to complete the mitigation described above would be available to the city to apply to its project.

- 6.23. Highway 101 - Millbrae Avenue interchange mitigation 3.1 (page 3.1-14) also seems to be seriously qualified. The suggestion is that BART would contribute a fair share if Caltrans, in concert with the City of Millbrae or others, were to decide to undertake this project. What if Caltrans and the City of Millbrae or others are unable to undertake this project? Would there remain a severely congested interchange caused primarily by a Millbrae BART station?

Response. Meetings are occurring among Caltrans, the City of Millbrae, SFIA, and BART to address improvements to the Millbrae Avenue Interchange. The BART–San Francisco Airport Extension project would commit funding to improve traffic operations on the ramps that would be affected by BART-related traffic. The City of Millbrae has agreed to take a lead role in the development of improvements to the Millbrae Avenue interchange. If the project sponsors are the only source of funding for improvements to the Millbrae Avenue interchange, then the design would need to reflect the funding available. Such an improvement would mitigate the cumulative impact to the Millbrae Avenue interchange associated with the proposed Millbrae Avenue Station.

Please note that the traffic congestion on the Millbrae Interchange is not caused primarily by the Millbrae BART station as stated in the comment but rather by the increase in traffic between the No Build Alternative in 1993 and in 2010. An analysis of the northbound weave between the Millbrae Avenue loop on-ramp and loop off-ramp for Highway 101 is forecast to be at LOS F under the No Build Alternative in 2010 and remains at LOS F under Alternative VI in 2010 with a cumulative impact to this weave segment.

Possible mitigation measures are described in the FRDEIR/S#2DEIS on pages 3.1-13 and 3.1-14. This improvement is the same as that suggested by the commentor, i.e., a partial cloverleaf (Par-Clo) design that would eliminate the loop off-ramps from Highway 101 to Millbrae Avenue. Under this design, northbound vehicles accessing the Millbrae Avenue BART Station would be required to use the diagonal off-ramp and turn left at a new traffic signal. Such a change would reduce the cumulative impact under Alternative VI and the Alternative VI Aerial Design Option to an insignificant level, as well as the significant impact under the No Build Alternative, by eliminating the conflicting weave movement with traffic from the northbound loop on-ramp.

Please also refer to Response 7.4 for additional discussion of impacts related to the Millbrae Avenue interchange.

- 6.24. Congestion Management is not addressed in the draft EIR/EIS. San Mateo County's Congestion Management Plan imposes sanctions on cities and developers of proposed projects in cases where traffic levels of service (LOS) are below prescribed levels....In the future, it may be difficult or impossible for development, such as transit-oriented projects encouraged by BART, to occur because available traffic capacities will have been absorbed by impacts of the BART extension. Unless the traffic impacts of the Airport Extension are fully mitigated by BART, subsequent development in traffic corridors already impacted by BART, would not be feasible and the local communities would be penalized.

Response. In general, the BART–San Francisco Airport Extension would help improve the level of service in San Mateo County north of the end-of-line station, which for the Aerial Design Option LPA would be north of Millbrae Avenue. The roadway network with a decreased level of service under the BART build alternatives include the streets and intersections near the BART–San Francisco Airport Extension stations. Nearly all streets and intersections where a BART build alternative would create a significant traffic impact would be mitigated to a less than significant level. The first of two exceptions would be the El Camino Real and Millbrae Avenue intersection, where the impact was

deemed significant and unavoidable, although sponsors of the BART–San Francisco Airport Extension have stated that significant financial contributions would be made to the City of Millbrae. The other exception is traffic impacts on Highway 101 between the Millbrae Avenue interchange and the Third Avenue Interchange where these impacts were deemed significant and unavoidable. Please refer to Response 18.9 for further discussion of traffic impacts and traffic volumes on Highway 101.

The subarea traffic model that projected the future level of service for these streets and intersections includes all the future development accounted for in the Association of Bay Area Governments (ABAG) growth projections plus special enhancements to include growth that is part of the SFIA Master Plan. Any future project not included in these projections is outside the scope of the FEIR/FEIS or FRDEIR/S#2DEIS; it would be the responsibility of the project developers to mitigate traffic impacts associated with any such development.

- 6.25. San Mateo County C/CAG has formulated a traffic model for the County. Has this model been considered in evaluating the effects of BART: have the effects of BART been considered in the C/CAG model?

Response. Staff from San Mateo City and County Association of Governments (C/CAG) has informed BART staff of C/CAG's intent to evaluate the BART–San Francisco Airport Extension, using the travel demand model which the agency is developing. The model results have not been made available to BART at the time of preparing the FEIR/FEIS. Any patronage or traffic forecasts prepared using the San Mateo County model would be independent of the BART–San Francisco Airport Extension model results that used federally approved MTC travel demand model forecasts. The MTC model was used consistently throughout the preparation of the AA/DEIS/DEIR, DEIR/SDEIS, and FRDEIR/S#2DEIS, and is necessary in order to compare the alternatives studied throughout these environmental documents.

- 6.26. Parking spillover from the Millbrae Station is acknowledged in the draft EIR/EIS (page 3.1-16). However, there is no indication of how much spillover and which areas would be affected. Experience at existing BART stations would be critical to this evaluation and should be included in the EIR/EIS.

Response. Spillover parking is not expected to occur because the parking supply should be adequate to meet demand.

BART's policy is to provide sufficient off-street parking and feeder bus service to meet the projected passenger access demand at all new stations. Mitigation Measure 2.1 in the DEIR/Technical Appendix, Residential Permit Parking, establishes a monitoring program to determine if and when substantial spillover parking occurs due to unanticipated events. If spillover parking causes parking shortages on local streets, then a residential permit parking program could be implemented. These programs have been used successfully around BART stations and other activity centers in the Bay Area. Patrons who choose to park in an area designated as Residential Permit Parking, would incur substantial penalties and fines. This is an effective deterrent in other areas with similar programs.

Designing infrastructure for an average day with 10 to 20 percent buffer for overflow is standard design practice. Parking lots at BART stations along the extension were designed for an average day plus a 10 to 20 percent reserve for days that exceeded the average. In order to determine how the weekday ridership (and therefore parking) fluctuates over the course of a year, the 1993 and 1994 weekday patronage at similar stations on the existing system were reviewed (e.g., San Leandro, Bay Fair, Hayward, MacArthur, Rockridge, Walnut Creek, Pleasant Hill, Concord, Daly City, El Cerrito Plaza, El Cerrito Del Norte). The variance between the average weekday patronage and maximum weekday average is less than 10 percent.

- 6.27. A BART station at Millbrae Avenue would impact nearby private parking facilities at Burlingame Plaza, Peninsula Hospital and at the medical offices bounded by El Camino Real, Murchison,

California and Trousdale. Mitigation should be required for the parking impacts on these facilities. In addition, mitigation of parking spillover into local streets and neighborhoods should go beyond merely suggesting that cities impose permit parking and have strict parking enforcement.

Response. The Millbrae Avenue Station would have sufficient parking to meet the forecast demand. Therefore, parking at these private parking facilities would not be affected by a BART station in Millbrae. A monitoring program would be established to determine if spillover parking were occurring. If determined that spillover parking from the Millbrae Avenue Station were occurring, then one of a number of programs would be implemented, depending upon the type of area where spillover occurred. The Residential Permit Parking program would be used in residential areas, while parking meters or restricted parking zones would be used in commercial areas. Please refer to Response 6.26 for further discussion of spillover parking.

- 6.28. There is a need for more analysis of the potential for Airport employees and patrons to park within or near the Millbrae Station. Airport parking is scarce and expensive. Even with the proposed Airport expansion there will remain a shortage of several thousand parking spaces at the Airport.

Response. Air passenger parking would not be allowed at the BART–San Francisco Airport Extension stations. Please refer to Response 9.9 for a discussion of air passenger parking at BART extension stations.

According to traffic analysis performed, airport employees would not drive and park at one of the BART extension stations, and then ride BART to the airport. The analysis revealed that the travel distance on BART from one of these stations would be too short for auto drivers to change their mode, especially when the supply of parking for employees at the airport is forecasted to be adequate to meet future demand as described in the SFIA Master Plan FEIR. Some airport workers were forecasted to use other transit providers, such as CalTrain and buses, to access one of the BART extension stations to travel to and from SFIA.

According to the SFIA Master Plan FEIR, the total parking demand for air passenger and employees is 23,908 spaces in 1991; the total supply of parking spaces for SFIA in 1991 was 30,729 spaces, with a difference of 6,821 spaces. However, the Master Plan EIR does note that the parking supply would not meet the parking demand with the planned Airport expansion. On page 327 of the SFIA Master Plan FEIR, Volume I, it states, “In 2006, the parking demand from employees and air passengers would be about 42,200 spaces. The total number of spaces provided by the project in 2006 would be about 37,800, a deficit of approximately 4,400 parking spaces.” However, these estimates do not include the possible reduction in parking demand as a result of the BART–San Francisco Airport Extension. Table 47, Long-Term Parking Supply and Demand, in the SFIA Master Plan FEIR, Volume I, indicates that employees at SFIA are projected to have enough parking spaces to meet the demand, but there would be a deficit of public parking spaces.

- 6.29. A proposed bicycle path in or along the CalTrain right-of-way in Burlingame may be affected by the proposed tailtrack and CalTrain realignment. This potential impact should be addressed in the EIR/EIS.

Response. The proposed tailtrack and CalTrain realignment in Burlingame have been taken into consideration in developing the proposed bike path. Preliminary plans for the bike path in the vicinity of the BART alignment indicate that the path would not extend south of Millbrae Avenue. See Volume I of the FEIR/FEIS for a general description of a proposed bike path utilizing the BART right-of-way. Please also refer to Response S44.4 for a discussion of the proposed bike path.

- 6.30. Displaced employees are said to be less than with [Alternative] VI Tunnel (page 3.2-2). The difference is that a service station would not be removed with the revised plan for Millbrae Station. There is no

number given for the total employees at the service station but it is not likely they would exceed the number lost from the businesses required for the Adrian extension proposed in the revised plan.

Response. The service station has approximately 5 to 10 full-time equivalent employees. The Alternative VI Aerial Design Option Millbrae Station reconfiguration contains an extension of Adrian Road. This extension of Adrian Road may require the partial acquisition of commercial property, including cut and reconstruction of the buildings east of the CalTrain right-of-way south of Millbrae Avenue. However, this partial acquisition should not result in a permanent loss of jobs.

- 6.31. Hertz employees are numbered at 10 to 15 (page 3.2-2). This number should be recalculated to include all administrative, sales and maintenance personnel as well as the large number of drivers who shuttle cars between Millbrae Avenue and the Airport 24 hours a day.

Response. The commentor's remarks are noted. The number of employees associated with the relocation of the Hertz facility will be determined in the BART Final Relocation Plan (FRP) and included in Volume V, Technical Appendices, of this FEIR/FEIS.

- 6.32. A portion of Adrian Road that appears to be improved street actually is private property and is used as parking for adjacent businesses. Therefore, the actual displacement may be greater than stated if some businesses are unable to continue if they lose necessary parking.

Response. The proposed extension of Adrian Road would impact private property used for parking. If business parking is displaced as a result of the project, the business may be eligible for relocation assistance benefits, in accordance with federal and state Relocation Assistance Laws. BART would coordinate with impacted businesses and the city to provide and maintain business-related parking.

- 6.33. CalTrain parking currently exists in Millbrae and Burlingame adjacent to the CalTrain station. There needs to be consideration of and mention of the future use of this significant property if the CalTrain station is moved northerly. There is mention of the historic station building being moved westerly but no mention of the future of the land now occupied by parking.

Response. The existing Millbrae CalTrain parking lot would remain a CalTrain parking lot. The project would not result in loss of parking at the Millbrae CalTrain Station. Although the BART/CalTrain intermodal station would be developed in Millbrae, this development would not have an effect on the existing uses and historical value of the Millbrae CalTrain Station. Please refer to Response 4.5 for a discussion of the revised plans for the Millbrae CalTrain Station.

- 6.34. There also is an issue of the revenue now generated by the parking. If the area is not continued to be used for parking, the revenue would be lost.

Response. Since publication of the FRDEIR/S#2DEIS, it has been determined that the Millbrae Station will not have to be relocated. Therefore, no CalTrain parking will be displaced or revenue lost.

- 6.35. In addition to the lost revenue, there may be an effect on businesses in Burlingame that use the CalTrain lot for parking. These businesses are non-conforming in not having enough off-street parking so the adjacent CalTrain parking is an important resource to keep these businesses functioning. It is important to address the future of the existing parking and the effects of its loss in the EIR/EIS.

Response. As discussed in Response 6.33, the existing Millbrae CalTrain parking lot would remain a CalTrain parking lot.

- 6.36. The Millbrae Avenue Station Area Concept Plan is mentioned on page 3.3-2. If the plan is adopted, as it states in the draft EIR/EIS, there would have had to be an environmental determination which would have quantified its environmental effects, including traffic. Therefore, the draft EIR/EIS should

include in its analysis the cumulative effects of traffic, and other effects of the Concept Plan. However, if it is not legally adopted, it should not be used to influence the design of the BART station.

Response. The Millbrae Avenue Station Area Concept Plan was developed by the City of Millbrae and, as a whole, is not part of the BART–San Francisco Airport Extension. If the City of Millbrae decided to adopt and develop this plan, then an environmental evaluation of this plan would be performed independently of the BART extension. The Millbrae Avenue Station Area Concept Plan was submitted to BART as part of the City of Millbrae’s comments to the DEIR/SDEIS. The sponsors of the proposed project have reviewed the Millbrae Avenue Station Area Concept Plan, and any elements from this plan that have been incorporated there have been evaluated for environmental impacts. None were identified.

- 6.37. Alternative VI was in conflict with the Millbrae General Plan. Unless the Millbrae General Plan has been amended to remove the conflict, the conflict remains and should be so stated in the September draft EIR/EIS. There also should be an indication of whether or not the Concept Plan is consistent with the Millbrae General Plan.

Response. The FRDEIR/S#2DEIS indicates, on page 3.2-2 under Impact 3, that the Millbrae Avenue Station is consistent with the Area Concept Plan adopted by the City of Millbrae. The location of the station at Millbrae Avenue under the Aerial Design Option LPA would still be inconsistent with Millbrae Land Use Element Policy 4, as stated in the DEIR/Technical Appendix on page 3.2-5, Impact 8. This policy calls for preserving the character of existing residential neighborhoods.

According to state law, BART is not required to comply with local plans and policies. BART nevertheless wishes to disclose to the public and to local jurisdictions the extent to which the project is consistent with adopted local general plans and land use goals.

- 6.38. Relocation of 525 residents (Table ES-2, page ES-12) in San Mateo County is a serious problem. Simply stating that governmental relocation requirements will be met may not take into account the difficulty of finding suitable housing in this expensive market, which has very few suitable sites for new housing and a shortage of vacancies.

Response. Federal and state relocation laws require that a Final Relocation Plan (FRP) be prepared prior to relocation of residents and businesses. The FRP will document the quantity of replacement housing required for the project as well as the amount of replacement housing available to meet the needs of displaced residents, in accordance with Uniform Relocation Act requirements. This comprehensive report will detail all aspects of residential and business impacts. The report, prepared by BART, is included in Volume V, Technical Appendices, of this FEIR/FEIS.

- 6.39. If relocation is to be out of the community, it would mean a loss of several million dollars per year to the local economy. In addition, more than 200 units of existing low income housing would be eliminated.

Response. The magnitude of relocations is determined in the BART Final Relocation Plan, included in Volume V, Technical Appendices, of this FEIR/FEIS. Such relocation would represent a loss to the local economy only if the businesses and households could not be relocated into the same or nearby communities. The Millbrae Garden Apartments do not qualify as “low income housing,” although they are low-cost, affordable housing when compared to median housing prices for the City of Millbrae. The term “low income housing” refers to housing that is federally assisted or subsidized, which is not the case for Millbrae Garden Apartments.

- 6.40. Tax loss to local government, including school districts would be substantial. In addition to tax on acquired property, with loss of students the elementary and high schools would lose State money. The extent of this revenue loss and its effect on the local agencies has not been evaluated.

Response. BART/SamTrans will address demonstrable loss of income to the Millbrae School District, in accordance with state and federal relocation laws applicable to non-profit organizations and public agencies. Please refer to the last paragraph on page 3.2-47 of the DEIR/Technical Appendix for a description of relocation mitigation in Millbrae.

Local governments have collaborated with BART/SamTrans to develop station area concept plans which assess preferred land uses. The station area concept reports provide in-depth analysis of income and revenue projects as they apply to the local tax base and the effect on each city from the location of a BART station in the community. Economic research consultants were retained by the cities of Millbrae, San Bruno, and South San Francisco; their respective reports have been incorporated into the City's approved station area concept plans. Each station area concept plan weighs the local benefits of a BART station against the impacts resulting from such a station location.

- 6.41. Economic impacts of the Millbrae Station would be as likely to effect land in Burlingame as in Millbrae. The draft EIR/EIS does not seem to acknowledge that the Millbrae Station would be virtually on the border between Millbrae and Burlingame. There should be analysis of the land uses in Burlingame near the proposed station and an indication of which positive and/or negative changes might be influenced.

Response. The map on page 3.2-29 of the DEIR/Technical Appendix shows the Millbrae City limits and the border with Burlingame. Existing Burlingame land uses are described on pages 3.2-32 and 3.2-33 of the DEIR/Technical Appendix and are illustrated on page 3.2-34. Impact 11 on page 3.2-54 of the DEIR/Technical Appendix describes the possibility of intensification of commercial and industrial land use in areas of northern Burlingame which "would be within walking distance of the Millbrae Avenue Station."

- 6.42. A landscaped wall along California Drive in Burlingame would replace existing eucalyptus trees. The California Drive streetscape is described as not well defined. Burlingame residents and officials have a very strong attachment to the City's eucalyptus trees and for decades have taken measures to protect and preserve them. Additionally, the City would not agree that the California Drive streetscape, with its dense, mature screen plantings, is not well defined. If the trees and other planting must be removed, an earthen berm or other appropriate replacement must be formulated in cooperation with and to the satisfaction of the City of Burlingame.

Response. The streetscape along California Drive is not considered well defined due to its lack of human-scale features, continuous building facades, and sidewalks.

A wall will be placed between the existing Southern Pacific parking and the CalTrain tracks in the area of the Burlingame tailtracks. Trees will not be removed on the west side of the tracks.

- 6.43. Care West Burlingame is mentioned in the January, 1995 draft EIR/EIS as a sensitive receptor but in the September, 1995 draft it states that the sensitive receptors would be greater than 60 feet away (page 3.3-2). It is not clear why visual sensitivity is limited to 60 feet, perhaps some standard or guideline needs to be referenced.

Response. The 60-foot standard for determination of significant visual encroachment is based on urban design studies. At 60 feet, facial features are normally discernible, and a loss of privacy and visual encroachment are experienced. Other transportation studies in which this standard has been applied include the Metro Rail Project EIR/EIS for the Southern California Rapid Transit District, the Long Beach-Los Angeles Rail Transit Project for the Los Angeles County Transportation Commission, and the Holly Street Grade Separation EIR for the City of San Carlos.

Care West Burlingame is a sensitive receptor, but lies approximately 160 feet from the BART tailtracks.

- 6.44. Car storage on the tailtrack in Burlingame should be screened from view. It is not clear if the proposed berm and/or wall would achieve this objective.

Response. As described in Impact 3 on page 3.3-2 of the FRDEIR/S#2DEIS, no significant views, streetscapes, or sensitive receptors would be affected by the landscaped wall. Since no significant views, streetscapes, or sensitive receptors exist near storage tracks that lie behind the wall in Burlingame, specific mitigation for the storage tracks is not required. The landscaped wall will, to a large extent, screen the car storage area from passers-by on California Drive.

- 6.45. The draft EIR/EIS does not acknowledge that the Burlingame Police Station is only two blocks from the proposed Millbrae BART Station and that Burlingame's Fire Department may be the first to respond because of its proximity, even though the BART station may be in Millbrae.

Response. Although the Burlingame Police Station and Fire Departments are in proximity to the Millbrae Avenue BART Station, the City of Millbrae has jurisdiction in this area. The Millbrae Police Department and the Millbrae Fire Station lie almost the same distance from the station as the Burlingame facilities. Response times would not be significantly greater from the Millbrae agencies than from Burlingame's.

- 6.46. Is it intended that Burlingame be a party to the BART District Emergency Procedures Policy, Vital Protection, Communications and Training Agreement mentioned on page 3.5-5 of the January, 1995 draft EIR/EIS? Also, would the City of Burlingame be reimbursed for capital or operating costs to implement this agreement?

Response. The commentor's reference is to the DEIR/SDEIS (January 1995) rather than the FRDEIR/S#2DEIS (September 1995). As stated on page 3.5-5 of the DEIR/SDEIS, local jurisdictions with current BART service have entered into the agreement. Emergencies requiring response from local fire departments are relatively rare, and the greatest demand on local services is the requirement to participate in BART fire training exercises. Local jurisdictions cover the costs of these additional responsibilities.

- 6.47. Fire service impacts are described as remaining potentially significant (page 3.5-9 September draft) yet no mitigation is proposed.

Response. The commentor's reference is to the DEIR/SDEIS (January 1995) rather than the FRDEIR/S#2DEIS (September 1995). Page 3.5-9 of the DEIR/SDEIS does acknowledge that demand for fire and emergency services would increase. Based on further consideration of CEQA and NEPA and a recent California Court of Appeal decision (*Goleta Union School District v. Regents of the University of California*), increased demand for community services does not by itself constitute a significant effect. If the increased demand triggers a physical environmental impact, then mitigation would be relevant. Mitigation would serve to address the physical environmental effects, not the shortage of community services. Furthermore, the increased demand for use of public services or facilities from a new project is not an environmental impact under CEQA. An impact analysis under CEQA should focus on adverse changes to the environment that may result from the project. Increased demand for community services are frequently addressed through measures which do not affect the environment. Furthermore, selecting the method for responding to increased demands on public services or facilities is the responsibility of the public agency providing the service or facility, not BART.

- 6.48. A major sewer main crosses under the railroad tracks near the project area. Would this main be affected?

Response. The tailtracks in Burlingame would be constructed nearly at grade so that excavation would not interfere with subsurface utilities. The existing sewer piping would be protected during construction of the BART tailtracks.

- 6.49. Public access to the BART area needs to be restricted. At the end of the BART tracks, where CalTrain tracks are accessible, how will persons be prevented from getting to the BART tracks?

Response. BART restricts access to its operating area by maintaining perimeter fencing, which prevents non-affiliated persons from entering areas where the electrified third rail is present. This fenced area includes the tailtracks. The BART tracks in Burlingame would be separated from the CalTrain tracks, as well as from the public, by fencing.

- 6.50. Electrolysis caused by third rail near buried metal drains and pipes is a concern. This needs investigation, description and mitigation if there is an adverse effect.

Response. In accordance with strict construction standards, the live third rail will be electrically isolated from the ground to prevent the migration of stray current to nearby signaling devices. As a consequence, no adverse effects are anticipated. If deemed necessary during final design analysis, cathodic protection would be added to buried metallic pipe to offset the effects of electrolysis.

- 6.51. A summary of the habitat that would be disturbed would be helpful to the reader. It appears that the total acreage is 11.47.

Response. Unavoidable disturbances to the west of Bayshore parcel habitat for the endangered San Francisco garter snake and threatened California red-legged frog would total 10 to 12 acres of this 180-acre parcel.

- 6.52. Drainage canals in Burlingame within the project area may be habitat as are the canals to the north. Were they investigated?

Response. The entire proposed corridor was surveyed in December 1990, and between January and May 1992. Additional focused surveys were conducted on portions of the proposed corridor to address specific sensitive plant and animal species.

It is not clear to which "drainage canals" the commentor is referring. If the referenced canal is the El Portal Creek Canal, then impacts to the San Francisco garter snake would not be expected since the canal is cement lined and there is little suitable habitat.

- 6.53. Mitigation for flooding and water quality impacts were outlined in the January, 1995 draft EIR/EIS (page 3.8-11). Is it understood that the same mitigations are to be incorporated into the September, 1995 EIR/EIS.

Response. The FRDEIR/S#2DEIS refers the reader to Chapter 3, Section 8.2, of the DEIR/SDEIS for mitigation measures for flooding and water quality impacts. These mitigation measures will be incorporated into the Alternative VI Aerial Design Option, where applicable.

- 6.54. Drainage facilities in the tailtrack area must meet clean water standards.

Response. Any discharges from the tailtrack area would be subject to Regional Water Quality Control Board (RWQCB) standards and the requirements of the National Pollution Discharge Elimination System (NPDES) permit to meet clean water standards.

- 6.55. The draft EIR/EIS does not describe the relationship among noise levels from various sources and the cumulative effect of projected future noise levels. Standards employed by BART are not acceptable when applied in the absence of other applicable standards.

Response. The DEIR/SDEIS analyzed the cumulative effect of all potentially significant environmental noise sources in the project study area where BART could appreciably contribute to the ambient noise environment. The existing conditions for the project study area are discussed in Chapter 3, Section 9.2 of the DEIR/Technical Appendix. The criteria for evaluating significance of cumulative impacts are indicated under "Relative Criteria" (page 3.9-14 of the DEIR/Technical Appendix).

The cumulative noise assessment criteria used (originally developed by UMTA, now FTA) are universally accepted criteria for assessing cumulative noise impacts from multiple sources (e.g., traffic, transit, airplanes). These criteria are specified in terms of changes to the L_{eq} and L_{dn} ambient noise levels, which are noise measures widely accepted by communities, including those in the study area. The projected change in noise levels is evaluated in the cumulative noise impact analysis.

The impact of individual transit train noise was also evaluated, using standards that are widely accepted in North America for this specific noise source. The individual train noise criteria are indicated in Table 3.9-3 of the DEIR/Technical Appendix. These criteria have been in use for over 20 years and were established by the American Public Transit Association for minimizing noise impacts to the surrounding community. The analysis for the FRDEIR/S#2DEIS uses the same methodology as the DEIR/SDEIS and DEIR/Technical Appendix.

Please refer to the following tables in the DEIR/Technical Appendix for project-specific cumulative standards for noise and vibrations:

- Table 3.9-3, Criteria for Maximum Airborne Noise from Transit Train Operations.
- Table 3.9-4, Criteria for Maximum Groundborne Noise from Transit Train Operations.
- Table 3.9-5, Criteria for Maximum Groundborne Vibration from Transit Train Operations.
- Table 3.9-6, Design Criteria for Noise from Transit System Ancillary Facilities.

- 6.56. Noise barrier design is a concern. Experience in Burlingame with walls along Highway 101 has shown that sound tends to wash over the walls and increase noise levels at locations that had never before had such high levels. What assurance will be provided that a wall intended to mitigate both visual and noise impacts will be properly designed? How will the wall be designed to reduce noise at the open end of the wall? Answer to the above questions would be more easily understood with a graphic description that showed which areas would be subject to high noise levels.

Response. A noise and vibration analysis was conducted for the Burlingame tailtrack area under Alternative VI and the Aerial Design Option LPA. As described on page 3.9-85 of the DEIR/Technical Appendix, the tailtracks in Burlingame would not result in significant noise and vibration impacts, because train speeds are less than 25 mph on the tailtracks and sensitive receptors are more than 150 feet from the alignment. Under the Aerial Design Option, a visual wall would be located between the CalTrain tracks and the existing Millbrae CalTrain Station parking lot in Burlingame. No sound wall is needed under the Aerial Design Option LPA because no significant impacts are indicated either along California Drive or south of the visual wall.

- 6.57. Care West Burlingame on California Drive would be opposite the proposed tailtrack. This is a sensitive receptor which requires analysis for noise and vibration.

Response. Under Alternative VI, Care West would be approximately 160 feet from the nearest BART track. The BART trains would be moving very slowly on the tailtracks, creating little noise and

vibration, especially at 160 feet away. The existing noise and vibration from CalTrain is much more substantial. Steady traffic on California Drive dominates the existing ambient noise, which is contributed to by noise from CalTrain and from jets at the airport resulting in an L_{dn} 74 A-weighted decibels (dBA). BART train noise would change the ambient noise level by less than 1 dBA.

- 6.58. Tailtrack activities and their potential effects should be clearly described. There needs to be a description of the noise and vibration from switching the 60 cars to be stored there. In addition, there should be a description of the activities at the inspection pit and the potential environmental effects of those activities.

Response. Trains in the storage yard would be restricted to 25 mph and would generally operate at speeds lower than on the Millbrae Avenue Station tailtracks. The existing ambient noise from SFIA, CalTrain, and Highway 101 would generally be greater than BART's storage yard operations. Thus, the noise and vibration impact of moving BART cars in the tailtrack area would not be significant. The inspection pit would be used for checking BART cars and performing only minor repairs necessary to move cars to the Daly City Yard, where the required repairs would be performed at existing facilities. There would be no significant noise-related activities associated with the inspection pit.

- 6.59. Would the additional track and activity thereon required for the dedicated Airport shuttle generate additional noise and vibration?

Response. The noise and vibration impacts associated with trains on the aerial wye-stub track for the "dedicated Airport shuttle" have been included in the environmental analysis. The only significant noise impact specifically from this track and the shuttle activity is projected at Lomita Park School and at a SFIA office building. Noise mitigation for this impact is identified on page 3.9-6 of the FRDEIR/S#2DEIS. The potential for airborne noise to these land uses would be mitigated to an insignificant level using an aerial structure sound barrier wall. Other sensitive receptors in San Bruno would be exposed to significant noise and vibration levels but these occur along segments of the alignment other than the airport shuttle portion.

- 6.60. Public Safety services during construction would be disrupted. How would BART work with the affected agencies and departments to minimize the disruptive effects?

Response. As discussed on pages 3.13-19 through 3.13440 of the FRDEIR/S#2DEIS, each affected jurisdiction will be notified of proposed construction plans, road detours and road closures. Acceptable traffic detour/rerouting plans will be negotiated. These plans would allow local jurisdictions to develop alternate response routes in the event of emergencies.

- 6.61. Tailtrack area access during construction needs to be explained in more detail. Would construction vehicles use Burlingame streets?

Response. Primary access from Highway 101 to the tailtrack areas for construction equipment and materials would be along Millbrae Avenue to California Drive, and south on California Drive as far as Rosedale Avenue. Please refer to Response 6.60 for a discussion of efforts to minimize construction transportation impacts.

- 6.62. Tailtrack construction could result in problems with drainage, sewer and water mains, contaminants and other issues for which the City of Burlingame should be held harmless.

Response. As the preliminary engineering proceeds, the detailed design associated with drainage, sewer, water mains, and potential contaminants would be submitted to the appropriate local agencies for review and comment. The design and construction of the BART extension would minimize and

eliminate, where practical, all impacts of this nature. The BART extension construction documents will require contractors to prepare the Storm Water Pollution Prevention Plan (SWPPP) that would be submitted to the California RWQCB for approval. This plan is intended to prevent the issues raised in the comment from occurring. In addition, BART specifications require contractor control of dust and storm drainage as well as control of discharges from equipment. The RWQCB requires BART to certify compliance with the SWPPP, and the RWQCB will make periodic inspections to determine compliance.

- 6.63. CalTrain track alignment in Burlingame and its effects [were] not adequately discussed.

Response. CalTrain track alignment in Burlingame would not be affected by the proposed project. Please refer to Responses 9.1 and 9.14 for additional information on the CalTrain track alignment.

- 6.64. It should be noted that Burlingame residents also would be disturbed during construction.

Response. The City of Burlingame would be able to review the detailed construction plans to assure that construction impacts to the residents of Burlingame are minimized. Please refer to the BART Specifications for Construction Contracts, Section 01500, paragraph 1.06, titled "Community Relations," which states the specific requirements for BART and its contractors to establish a program of public contact with communities and businesses to address these types of issues. These issues include effects from noise, vibration, visual, dust, pedestrian and traffic congestion, and safety.

- 6.65. The EIR/EIS should expand the analysis of noise around the Millbrae Station to include Burlingame. Areas potentially affected should be described and mitigation proposed.

Response. Noise impacts in Burlingame and Millbrae from BART trains and motor vehicle traffic associated with the Millbrae Station have been addressed. Impact 8 on page 3.9-5 of the FRDEIR/S#2DEIS explains that the operational impacts from the tailtracks in Burlingame would generate airborne noise levels below the applicable significance criterion. Please also refer to Response 6.58 for a discussion of noise-related impacts associated with the tailtracks in Burlingame.

- 6.66. Truck Volume related to the Millbrae Station area and the subway to the north of the station, is not quantified for the Millbrae Avenue-Rollins Road intersection. Overall, it is suggested there would be no impact from this activity but it is hard to believe that adding a number of large trucks to this congested intersection would have no impact.

Response. Please refer to Response 7.17 for a discussion of truck-related impacts of constructing the Millbrae Avenue Station.

- 6.67. Capital cost of either wye option is slightly over one billion dollars. About 35% of the cost is unfunded with the assumption that the federal government will make up most of the shortfall. Table 6-1 footnotes list a number of potential costs not included in the total, all of which would be added to the unfunded balance, increase the overall cost and reduce the cost-effectiveness.

Response. On April 28, 1995, the SamTrans Board of Directors approved Resolution No. 1995-45, adopting Alternative VI as the LPA for the BART-San Francisco Airport Extension. The SamTrans board took this action in conjunction with approval of a financial plan that enables SamTrans to continue financial support of its various transportation programs, specifically CalTrain, motor bus, and paratransit/ADA services.

The financial plan is fully described in and is an integral part of the SamTrans fiscal year 1995/96 to fiscal year 2004/05 Short Range Transit Plan.

The financial plan also required various actions, which include adjustments in the level of motor bus subsidy and amendment of the BART-SamTrans Comprehensive Agreement. The major elements of the plan are:

1. BART project costs will be paid from unrestricted reserves and from savings from elimination of duplicate and inefficient motor bus services.
 - a. Use of \$110 million in unrestricted reserves toward the near-term contribution of \$185 million.
 - b. Issuance of an estimated \$75 million in bonds to provide the balance of the required \$185 million.
 - c. Identification of bus system modifications to eliminate redundant and inefficient services through the Comprehensive Route Renovation Study.
2. Revision of the BART-SamTrans Comprehensive Agreement to change SamTrans participation in project costs.
 - a. Reduction of the near-term payment to BART from \$330 to \$185 million.
 - b. An absolute cap on SamTrans contribution to project construction costs.
 - c. The remaining \$145 million payment to BART to be made from net operating revenues, including fare surcharge revenues once the extension begins operation.

Regarding the unfunded portion of project costs, BART, SamTrans, and MTC are completing a Full Funding Grant Agreement at this time with the FTA. A FFGA and a complete financial plan will be presented as soon as they are final. As noted in Table 6-1, costs of financing (interest) and escalation beyond the midpoint of construction are not included in project costs. Both are eligible for federal funding. Costs were not escalated further in order to maintain consistency among the environmental documents, and to permit meaningful comparison of costs among the alternatives. For further discussion of the costs of financing and escalation, please refer to Chapter 6 of this FEIR/FEIS.

- 6.68. It is interesting to note that the Aerial Design Option X, with 1.1 miles more length, an additional station and 1,000 more parking spaces cost only \$10 million more than the 1992 LPA. The shift from the first LPA to the second LPA virtually doubled the cost.

Response. The cost of the 1992 LPA is estimated at \$1,046 million in 1996 dollars at midpoint of construction, and Aerial Design Option X is estimated to require \$1,054 million. The cost of Alternative VI is estimated at \$1,269 million, and the Aerial Design Option LPA is estimated to cost \$1,070 million (in 1996 dollars), excluding financing costs and escalation. The cost of the LPA reviewed in the Alternatives Analysis was estimated at \$960 million at midpoint of construction. Important differences in costs between the Alternatives Analysis LPA and the Aerial Design Option LPA include six years of inflation, longer lengths of subway construction, a straight-through track between San Bruno and Millbrae to avoid the SFIA for travelers not bound for the airport, increased parking capacity, four stations, insurance (not included in the Alternatives Analysis estimates), and more mitigation funds.

- 6.69. Local support for Alternative VI was conditioned upon a number of design changes, for example a bored tunnel through San Bruno rather than a cut-and-cover subway. The understanding was that a local agency, such as San Bruno, that requested a more costly design feature, would be expected to pay the difference. The draft EIR/FEIS does not indicate that any of the local government are assigned any of the capital costs of the project. Assuming the cities are unable to pay for the requested improvements, will these improvements become project mitigations or, if not, will this result in the loss of local support for the project?

Response. Table ES-1 of the FRDEIR/S#2DEIS summarizes the design features of BART build alternatives, including the Aerial Design Option LPA. As shown in Table ES-1, major portions of the Aerial Design Option LPA alignment would be constructed in subway. Large segments of the alignment would be constructed in subway configuration for engineering reasons, not as an enhancement. Further preliminary engineering has determined that subway construction cannot be avoided from Town of Colma to near San Felipe Avenue in City of San Bruno, where the alignment would rise to grade and to the aerial structure. Because the alignment would need to be below-grade under each of the 21 street intersections along the route and through the Town of Colma cemeteries, economies of scale would permit undergrounding lengthy portions of the alignment at no greater cost than if shorter segments were constructed in subway for the street intersections and cemeteries, with at-grade construction for the remainder.

Although not required for the purposes of NEPA or CEQA, Chapter 6 of the DEIR/SDEIS provides the public and decision makers with estimated capital and operations and maintenance costs associated with the Aerial Design Option LPA, including all design features described in detail in the DEIR/SDEIS. Chapter 6 also identifies the sources of funding for the Aerial Design Option LPA. If local cities, however, propose project enhancements to the Aerial Design Option LPA, in addition to the design features described in the FRDEIR/S#2DEIS, they would be responsible for securing the necessary additional funding for these enhancements.

- 6.70. Operation and maintenance cost (page 6-3) of the wye design options is about \$850,000 less than Alternative VI Tunnel. Even though capital cost is shown as being reduced about 16%, operation and maintenance is only about 2% less, indicating very little long term savings over the Alternative VI Tunnel.

Response. The purpose of shifting from a tunnel access to the SFIA International Terminal to aerial access was to reduce capital costs, not operating and maintenance (O&M) costs. O&M costs are very similar because the two alternatives have the same number of stations, approximately the same track length, and will carry approximately the same number of passengers. O&M costs of the extension are expected to be covered primarily by fare revenue, with a surcharge imposed by mutual agreement between SamTrans and BART.

- 6.71. The draft EIR/EIS does not describe where the \$34.4 or \$34.5 million for operation and maintenance will come from and what effect it will have on SamTrans' ability to meet all of its responsibilities in the future.

Response. Operation and maintenance costs will be covered by fare revenues and fare surcharges that BART and SamTrans, by mutual agreement, may impose at all stations on the BART extension. The BART-SamTrans Comprehensive Agreement stipulates that SamTrans, will be responsible for operations costs of the line, and will be credited with the full fare from entry station to exit station, if the trip begins or ends on the BART extension. However, SamTrans will be charged only for the operating and maintenance costs south of the Colma Station. With this arrangement, the fare recovery rate for the BART extension is expected to be approximately 85 percent. With a surcharge imposed in addition to the fare, total recovery is expected to be more than the marginal cost of operation and maintenance of the extension.

- 6.72. SamTrans' contribution to capital cost is described as \$99 million which is available from existing reserves (page 6-7). Actually, it is understood that the money would be from bond proceeds which must be paid back, as opposed to reserves which implies savings.

Response. SamTrans committed in early 1995 to providing \$99 million in capital costs to the extension project; the amount does not vary with selection of the BART build alternative.

- 6.73. The draft EIR/EIS does not fully describe SamTrans' overall commitment to contribute a buy-in payment plus the cost of the Colma Station and the need to secure long-term financing to meet their obligations to BART. There is concern that SamTrans' financial obligation to BART combined with reduced bus revenues from service cuts and patronage loss may effect SamTrans' ability to serve those who will still depend on bus service even with BART.

Response. Please refer to Response 6.67 for a discussion of SamTrans' capacity to support this project.

- 6.74 SFIA contribution is expressed as up to \$200 million. One mitigation for impacts of the Airport Master Plan on local streets and highways was \$200 million to be spent on transportation improvements. The draft EIR/EIS assumes that this is to be used for BART capital costs. If this is true, San Mateo County and its cities will lose potential street and highway improvements that could otherwise be funded with this money.

Response. The commentor is correct in noting that the SFIA has made a maximum capital contribution of \$200 million to the BART Extension. However, this amount is entirely separate from the commitment made by SFIA to traffic improvements in San Mateo County. Agreement on the transportation improvements will be worked out between the SFIA, the county, and the affected cities.

- 6.75. Financial Plan (page 6-6) to be developed by BART, MTC, SamTrans and SFIA is to be available after [the] project is selected. The problem with this approach is that it will not be available for public scrutiny before those agencies are so committed to the project they may not be able to back away from its high current and future costs.

Response. The capital costs of the BART extension are expected to be covered by the federal government, the SFIA, the state government, SamTrans, and West Bay bridge toll funds.

Completing a financial plan is a process that parallels the environmental process, and BART, SamTrans, MTC, and FTA are working closely with other agencies to bring all required resources together to cover the capital costs of the LPA. The proposed financial plan shown in the DEIR/SDEIS reflected the general level of detail before an LPA, with its associated conceptual cost estimates, was selected. A revised financial plan based upon the Aerial Design Option LPA is presented in Volume I of this FEIS/FEIR. A detailed financial plan will be defined before selection of a project by the BART and SamTrans boards.

- 6.76. Cost effectiveness is measured by an index, expressing a cost per new rider, which dropped from \$28.76 for Alternative VI Tunnel to \$26.32 for Option B and \$26.12 for Option X (page 6-11). The draft EIR/EIS compares Options B and X with the least cost effective of all the previous alternatives. For example, the index for Alternative V-B is \$19.41. It would be helpful to have current examples of cost effectiveness of other projects to be able to judge the cost effectiveness of the current alternatives.

Response. The cost-effectiveness indices (CEI) of Options B and X were compared to the CEI of Alternative VI, because Alternative VI was the LPA at the time of publication of the FRDEIR/S#2DEIS. The options were presented as design options to Alternative VI, not as new alternatives that required comparison with the alternatives previously reviewed.

FTA does not have a fixed CEI standard that a project must achieve in order to be funded. Transit construction projects ready for funding in the same period are evaluated together, with the CEI being one measure of comparison. Relative CEIs are reviewed, not the ability of a project to meet a particular standard. As described in the Intermodal Surface Transportation Efficiency Act (ISTEA), local decision-making has been confirmed as more important than achievement of a national standard.

Other projects being considered for federal funding include a rail line extension in New Jersey with a CEI of \$2.11 per new transit rider, and an extension of the rail line in St. Louis to Lambert-St. Louis International Airport with a CEI of \$36.00. The rail extension in New Jersey shows a low CEI because of the great population density in the corridor.

- 6.77. Mitigation importance must not be forgotten. There is concern that the proposed mitigation falls short of what is required by the project. Also, it is difficult for the reader to determine when impacts are determined to require mitigation. It would be helpful for reviewers and decision-makers if there were a table listing all impacts of the project and the mitigation, if any, proposed for each impact.

Response. Mitigation measures constitute an extremely important component of the environmental analysis of the Alternative VI Aerial Design Option. As described in "Overview" in Chapter 3, Environmental Analysis, all potential environmental impacts identified in the FRDEIR/S#2DEIR are classified, numbered, and coded as significant, insignificant, or beneficial, based on specific significance or threshold criteria. Feasible mitigation measures are recommended and numbered (to facilitate ease of cross-reference) for all significant impacts, and although not required, for some insignificant impacts.

Following finalization of the FRDEIR/S#2DEIS, BART must prepare written findings that explain, for each identified significant impact, what will be done to mitigate or avoid these impacts. Furthermore, BART will prepare a Mitigation Monitoring Program, in accordance with California law (AB3180). This Mitigation Monitoring Program will include the following: a summary of all significant adverse impacts and the specific mitigation measures intended to address those impacts; criteria for verifying implementation of the mitigation measures; a management plan for administering and supervising the monitoring efforts; an organization structure that identifies the various areas of responsibility and whom should carry out the activities; and a plan for quality assurance and quality control in the reporting.

- 6.78. There is the fear that when decision-makers begin cutting the budget on this extremely expensive project, the first budget item to be trimmed will be mitigation. There is a need for assurance that impacts generated by the project will be mitigated.

Response. BART's commitments to mitigation will be incorporated in the Mitigation Monitoring Program. Please see Response 6.77 for additional information on the state-mandated requirements. The BART project budget will include necessary mitigation costs to implement the Mitigation Monitoring Program.

- 6.79. Growth inducing impacts...[were] given little analysis in the January draft (page 4-20) and none in the September draft. It is very possible that the BART extension could stimulate growth in San Mateo County's service sector which has trouble finding employees for low paying positions because of the high cost of housing and difficult commute for those who can't find housing. BART could bring in a pool of labor from areas in the region with less expensive housing and served by BART.

Response. The DEIR/SDEIS presents the results of the analysis of growth-inducing impacts based on the ABAG input-output model. This model estimates direct and indirect construction and permanent employment, using regional ABAG multipliers. Due to the regional nature of the ABAG input-output model, the model can only forecast increased job opportunities throughout the region. It cannot pinpoint the location of growth or forecast the commuting patterns of the induced growth, because the model does not predict where the jobs would be located nor where the employees would choose to reside.

- 6.80. There is mention of growth being induced in areas of Millbrae near the BART station; however areas in Burlingame are close enough to the station to be subject to the same influence.

Response. The analysis of growth-inducing impacts in the DEIR/SDEIS indicates that although the area of the proposed Millbrae Avenue Station is largely built out, the proposed station could stimulate some development in this area of Millbrae with improved transit access. It cannot, however, be assumed that the proposed Millbrae Avenue Station would necessarily stimulate growth in adjacent areas of Burlingame. The ability of a major transit investment to stimulate appropriate land uses and economic growth is largely influenced by a local government's land use policies and decisions, as well as the decisions of local property owners.

Should the proposed station induce some growth in Millbrae or Burlingame, it is not expected to be significant, since the proposed BART station would not preclude existing commercial and residential properties from benefiting from the improved accessibility/mobility conferred by BART. Further, any localized development in Millbrae or Burlingame would generate property and sales tax revenues that could be used to offset potential increased demands for public services. In any case, possible increased public service demand resulting from such growth would not be expected to overburden local governments, and mitigation measures would not therefore be required.

- 6.81. The draft EIR/EIS declares that Alternative VI and the Aerial Design Option appear to be consistent with Executive Order No. 12898 to avoid disproportionate impacts on high minority neighborhoods (page 7-4). The rationale is that the Order merely requires that impacts on low income communities be identified and addressed while disproportionate impacts on high minority neighborhood be avoided. Reading of the Executive Order suggests a different interpretation which is that high minority and low income neighborhoods be treated the same and that disproportionate impacts be avoided. The draft acknowledges that the Aerial Design Option may have disproportionate impacts on low income neighborhoods.

Response. Executive Order No. 12898 requires agencies to identify and address, as appropriate, disproportionate effects to minority and low-income populations. However, the Executive Order's requirement to conduct activities in a certain manner applies only to "race, color, or national origin." This approach is consistent with civil rights legislation, such as Title VI of the Civil Rights Act of 1964.

To the extent that the project sponsors have distinguished between impacts on high-minority and low-income communities, they have done so to reflect this distinction. Nonetheless, the project sponsors have revised the appropriate language in the FRDEIR/S#2DEIS, page 7-4, paragraph 5 in order to eliminate confusion on this point:

Alternative VI and the Aerial Design Option may disproportionately impact low-income communities. ~~However, with~~ With respect to high-minority and low-income communities, the Executive Order No. 12898 only requires that "[t]o the extent practicable" such impacts shall be "identif[ied] and address[ed], as appropriate...." ~~Although all~~ All of the impacts discussed in this section are unmitigable, and these impacts have been appropriately addressed by identifying and analyzing a reasonable range of alternatives. Within the reasonable range of alternatives, only the No Build Alternative would not impose disproportionate impacts on low-income communities in the study area.¹

¹ This analysis does not take feasibility considerations into account. The build alternatives analyzed in this document have been shown, through an extensive public process, to be the only feasible build alternatives that satisfy project objectives.

In addition, the project sponsors have revised this text to be consistent with the Chapter 7 addendum to the DEIR/SDEIS distributed on January 20, 1995. Paragraph 4, page 7-4 of the FRDEIR/S#2DEIS is revised as follows:

As discussed in the DEIR/SDEIS and above, the proposed project (1992 LPA), and the I-380 Least-Cost Design Option, Alternative VI and the Aerial Design Option may result in disproportionate impacts on high-minority neighborhoods. ~~None of the other alternatives, including the Aerial Design Option, would create disproportionate impacts on high-minority neighborhoods. Accordingly, Alternative VI and the Aerial Design Option appear to be consistent with the mandate of Executive Order No. 12898 to avoid disproportionate impacts on high-minority neighborhoods.~~

Please also refer to Response 16.53 regarding impacts to high-minority neighborhoods.

7. CITY OF MILLBRAE

- 7.1. The City believes that design option "Q" for the SFO station, as agreed to by BART and the Airports Commission, is an appropriate and workable compromise to the needs of both rail and air transit, but the City still favors the bored tunnel configuration of Alternative VI.

Response. The commentator's support for Option Q and a bored tunnel configuration through the City of San Bruno is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA; to Response 10.1 of this FEIR/FEIS for discussion of how the BART Airport International Terminal Station must satisfy Passenger Service Quality Standards adopted by the BART board and Airports Commission, rather than be sited and designed as either Option Q or X; and to Response 24.1 for a discussion of why the bored tunnel construction method through San Bruno under Alternative VI was found to be infeasible.

- 7.2. While the City of Millbrae is opposed to any at grade alignment through the City in the existing corridor, the City requests that the document include an assessment of the impacts which might occur if the system were built at grade.

Response. An operational at-grade alignment through the City of Millbrae in the CalTrain corridor is not under consideration in any alternative being considered in either the DEIR/SDEIS or the FRDEIR/S#2DEIS and, thus, such an alignment is not analyzed. By way of extrapolation, Alternative IV included an at-grade tailtrack which extends approximately 3,800 feet south of the Millbrae Intermodal Station at Center Street to Garden Lane. While the train speeds are less and operations of a BART tailtrack are different than those on a segment of the BART mainline, the environmental analysis of the tailtrack under Alternative IV gives an indication of potential impacts of an at-grade alignment through the City of Millbrae.

An evaluation of the tailtrack under Alternative IV is contained in Chapter 3 of the DEIR/SDEIS and summarized in Table 2.4-2, Comparison of Key Impacts, pages 2-83 through 2-97. As summarized in Table 2.4-2, the Alternative IV tailtrack (1) conflicts with Millbrae plans; (2) introduces a physical barrier for Marino Vista and North Millbrae neighborhoods; and (3) lies within 60 feet of sensitive receptors. In addition, because of higher operational train speeds and the at-grade alignment along the CalTrain mainline, this alignment would potentially affect a greater number of sensitive receptors due to noise and vibration (before mitigation) than the Aerial Design Option.

- 7.3. The City requests that the document provide a more complete discussion of the controversial issue of the connectivity between the ALRS system and CalTrain.

Response. Please refer to Response 4.9 for a discussion of connectivity between the Airport Light Rail System (ALRS) and CalTrain. In addition, please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- 7.4. While significant portions of the Millbrae Avenue Station Area Concept Plan have been incorporated by reference into the FRDEIR/S#2[DEIS], the City requests that the document specify what constitutes “fair share” participation by the project proponents in proposed improvements to Millbrae Avenue and Highway 101 and Millbrae Avenue and El Camino Real. The City believes that mitigation of impacts to both of these intersections should be part of the proposed project and not considered to be “work to be performed by others.”

Response. In order to address BART-related impacts at the El Camino Real/Millbrae intersection, a potential intersection improvement is described on page 3.1-13 of the FRDEIR/S#2DEIS. This improvement would widen the east leg of Millbrae Avenue to create an additional eastbound through-lane to receive traffic from the other three legs of the intersection. This proposal to increase traffic capacity at this intersection would involve land acquisition and a business displacement, as well as retrofitting the Millbrae Avenue overpass. This upgrade would improve traffic operations at the El Camino Real/Millbrae intersection to an acceptable level under Alternative VI and the Alternative VI Aerial Design Option.

The suggested mitigation measure listed in the FRDEIR/S#2DEIS calls for BART to contribute its fair share of the improvement. This contribution would be based on the total cost of widening Millbrae Avenue to create an additional eastbound through-lane, and implementation within a reasonable amount of time.

Please refer to Response 6.21 for additional information on the intersection mitigation.

An analysis of the northbound weave between the Millbrae Avenue loop on-ramp and loop off-ramp for Highway 101 is forecast to be at Level of Service (LOS) F under the No Build Alternative in 2010, and remains at LOS F under Alternative VI in 2010, with a cumulative impact to this weave segment. Possible mitigation measures are described in the FRDEIR/S#2DEIS on pages 3.1-13 and 3.1-14. This improvement would modify the northbound exit ramps from Highway 101 to Millbrae Avenue. Under this design, northbound vehicles accessing the Millbrae Avenue BART Station would be required to use the diagonal off-ramp and turn left at a new traffic signal. This change would reduce the cumulative impact under Alternative VI and the Alternative VI Aerial Design Option to an insignificant level, as well as the significant impact under the No Build Alternative, by eliminating the conflicting weave movement with traffic from the northbound loop on-ramp.

Sponsors of the BART–San Francisco Airport Extension in cooperation with other relevant agencies, including Caltrans, San Mateo County, City of Millbrae, and the San Francisco International Airport (SFIA), and based upon programming and design studies led by the City of Millbrae, are committed to contributing their fair share participation in the cost of interchange improvements, which would be based upon the increase due to BART-related traffic.

- 7.5. The City requests that the document provide an analysis of the projected levels of service at Millbrae Avenue and Highway 101 and Millbrae and El Camino Real under the proposed configuration of the partial clover leaf (Par Clo) interchange and the proposed improvements to Millbrae Avenue eastbound at the grade separation structure. The traffic projections previously provided in the Supplemental #1 do not reflect the proposed improvements in Supplemental #2, nor do they accurately reflect the cumulative impact of the BART and SFO Expansion projects.

Response. The BART subarea traffic model includes the traffic associated with the SFIA Master Plan. The proposed addition of an eastbound through-lane from El Camino Real to Rollins Road to the intersection of El Camino Real and Millbrae Avenue would improve the projected traffic level of service from LOS E to LOS D under the Aerial Design Option LPA in 1998. Please also refer to Response 7.4 for a discussion of the traffic impacts at the Millbrae Avenue Interchange. Please also refer to Response 18.8 for further discussion of the cumulative impacts of the SFIA Master Plan to the BART extension.

- 7.6. The City requests that full analysis and proposed mitigation for all local traffic impacts of the project be included in the document, including a full assessment of traffic originating from Highway 280 to access the station by local streets.

Response. All local traffic impacts with the City of Millbrae have been addressed in the FRDEIR/S#2DEIS as well as in the DEIR/SDEIS.

Approximately 165 additional vehicles would exit I-280 to travel eastbound toward the Millbrae Avenue BART Station under Alternative VI during the A.M. peak hour, and approximately 25 BART-related vehicles would travel westbound onto I-280. Most of the BART-related vehicles using I-280 would travel on Trousdale Avenue, although some may use Millbrae Avenue. Under Alternative VI during the A.M. peak hour, these eastbound vehicles would increase to 275 between Ashton Avenue and El Camino Real, while an additional 75 vehicles would travel westbound in this corridor segment in 2010. These 350 additional vehicles would be from residences in the local neighborhoods, as well as vehicles using I-280. These same vehicles would use Trousdale Drive and Millbrae Avenue primarily, and Murchinson Drive and Hillcrest Boulevard secondarily. These four roadways are projected to carry approximately 2,300 eastbound vehicles and about 1,500 westbound vehicles during the A.M. peak hour under the No Build Alternative in 2010, between Ashton Avenue and El Camino Real. Approximately 855 vehicles are projected to travel eastbound and 500 westbound on Trousdale Avenue during the A.M. peak hour under the No Build Alternative in 2010.

- 7.7. The City believes that construction of all improvements in and around the Millbrae Avenue Station, including the improvement of Millbrae Avenue and Highway 101 and Millbrae Avenue and El Camino Real, must happen concurrently, and that all appropriate mitigations must be fully funded and completed prior to operation of the system and the opening of the Millbrae Avenue Station.

Response. The improvements to the Millbrae Avenue interchange with Highway 101 and to the intersection of El Camino Real and Millbrae would ideally be completed before the Millbrae Avenue Station is opened, although the need for these two improvement projects would not have to be constructed concurrently. While sponsors of the BART–San Francisco Airport Extension would contribute financially toward these two improvement projects, BART would not serve as the project sponsor for these roadway improvements. The City of Millbrae has agreed to take the lead in the development of improvements at the Millbrae Avenue/101 interchange.

- 7.8. The City requests that the document reflect traffic data as established by the San Mateo County Travel Demand Model, prepared and available for use by the San Mateo City and County Association of Governments.

Response. Please refer to Response 6.25 for a discussion of the relationship of the San Mateo County travel demand model to the BART extension EIR/EIS.

- 7.9. With the proposed modification of the operational profile at the Millbrae Avenue Station in the Aerial Design Option, the City of Millbrae requests that the document provide a station plan detail which indicates how many tracks will be required north of, inside and south of the Millbrae Avenue Station and whether or not the plan works with existing and proposed surface circulation plans and improvements.

Response. The tracks layout and traffic circulation plan for the Millbrae Avenue Station are shown in Figures 2-11 and 2-12 in Chapter 2 and amplified on the plan view of Figure 6 and cross section M on Figure 16 in the FRDEIR/S#2DEIS. There are two main tracks under and north of the new Millbrae Avenue overpass. The two main tracks continue south of the overpass, with the addition of two secondary tracks to facilitate turnback of trains and to provide storage. The track layout is coordinated with the bent layout of the new Millbrae overpass, as shown in Figure 2-12. The existing Southern Pacific spur in the vicinity would need to be removed prior to BART construction.

The traffic circulation plan for the station, east of the BART main tracks, consists of two primary accesses to the parking garage and surface lots, in accordance with comments from the City of Millbrae on the DEIR/SDEIS. The first is a northerly extension of Rollins Road from Millbrae Avenue. The second is a new road from Adrian Road, under the Millbrae overpass, to the parking area, as described on page 3.1-12 of the FRDEIR/S#2DEIS.

Traffic circulation west of the CalTrain tracks would not be revised by the BART project. The BART-proposed mitigation for traffic impacts at the Millbrae Avenue - El Camino Real intersection is discussed on page 3.1-12 and in Responses 6.21 and 7.4.

- 7.10. The City requests that the FRDEIR/[S]#2[DEIS] propose specific mitigation to both the long and the short term Noise and Vibration effects to Lomita Park School, the Serra Nursing Facility and the neighborhoods at Airport Park, Marino Vista and Bayside and all residential properties adjacent to the existing rail corridor from the north border of Millbrae to the Millbrae Avenue Station.

Response. Noise and vibration mitigation has been identified where sensitive receptors would experience significant impacts. Mitigation measures (e.g., noise walls) for long-term operational impacts have been discussed. The design of these mitigation measures would be developed in more detail during the preliminary engineering phase of the project. Similarly, short-term construction impacts and related mitigation (e.g., noise limits, quieter equipment) have been discussed for Alternative VI in the DEIR/SDEIS. An environmental compliance monitor would monitor offsite noise and vibration in the community during construction.

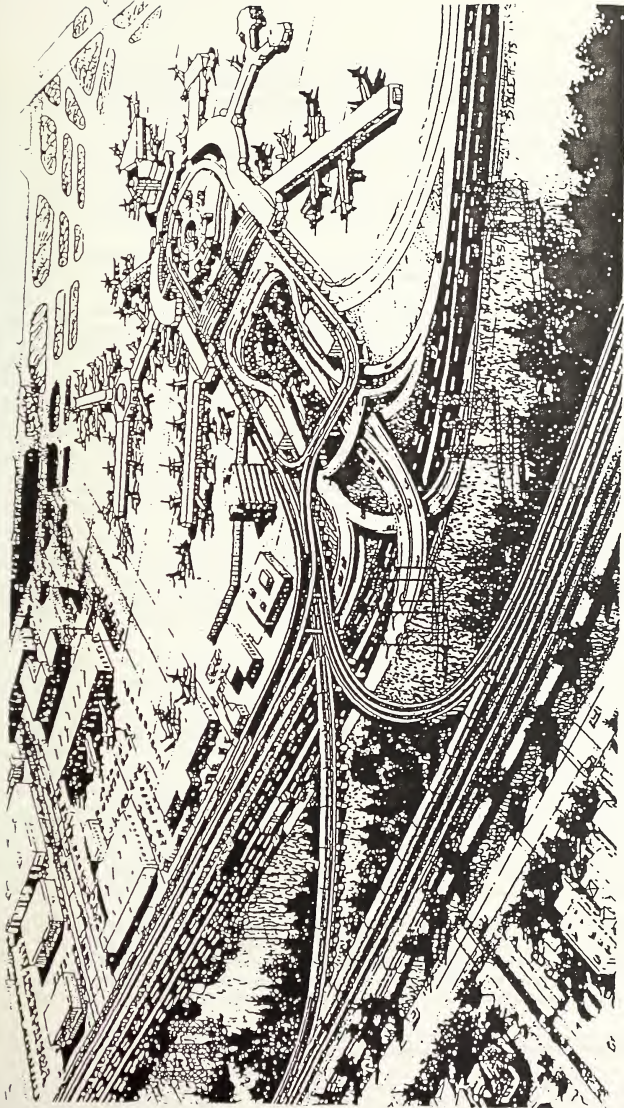
- 7.11. The City requests that the document provide accurate visual simulations of the impact of the “wey stub” aerial structure from northerly Millbrae neighborhoods and propose suitable screening techniques to shield the neighborhoods from visual impact.

Response. Although the written description portrays the visual quality of the structure, the figure on the following page is provided to show the approximate scale and mass of the aerial guideway relative to the open space and Highway 101 ramps. Given the height and mass of the aerial structure, there are no feasible mitigation measures to screen views from neighborhoods in northern Millbrae. This impact is described in paragraph seven, sentence one, on page 3.3-3 of the FRDEIR/S#2DEIS.

- 7.12. The City requests that the document provide evidence of concurrence from the U.S. Fish and Wildlife Service that the constructability of the aerial “wey stub” is feasible within the context of biological habitat issues.

Response. Appropriate mitigation measures related to the aerial wey-stub have been developed through Section 7 consultation with the USFWS and are described in the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS.

- 7.13. The City requests that the document identify all major vegetation to be preserved or removed during construction in Millbrae and propose appropriate mitigation for any removal.



Bird's Eye View of the Aerial Wye Alignment
Into San Francisco International Airport

Response. Significant construction impacts and proposed mitigation for vegetation removal are discussed on pages 3.13-24 - 3.13-36 of the FRDEIR/S#2DEIS. This section does not identify any major vegetation impacts in Millbrae.

- 7.14 The City requests that BART add a linear bike path in the rail corridor to the greatest extent possible.

Response. Development of a bike path along the project corridor is under consideration by BART and local jurisdictions. Please refer to Response S44.4 for further discussion of this issue, and Volume I of this FEIR/FEIS for a general description of a proposed bike path utilizing BART right-of-way.

- 7.15. The City requests that the document reflect the impacts of the proposed "garter snake preserve" with respect to flood control, existing wetlands and drainage in Millbrae.

Response. It is assumed that the proposed "garter snake preserve" refers to the Habitat Restoration Plan (HRP) prepared in 1992. The goal of the HRP was to establish a permanent preserve in the southern 18 acres of the SFIA property west of Highway 101. Implementation of the HRP would not result in an adverse impact to the wetlands.

The California Department of Fish and Game (CDFG), in comments on the DEIR/DEIS, indicated that the HRP, as conceptually proposed, would not allow for the maintenance of a viable San Francisco garter snake population. Consequently, BART has not pursued the HRP with the resource agencies but has reached an agreement with the USFWS regarding mitigation measures for the SFGS and red-legged frog on the west of Bayshore parcel, as presented in the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS. BART is currently conducting a hydraulic analysis of its proposed project and mitigation measures, and will incorporate these findings in the final design of facilities and wetlands.

- 7.16. The City requests that the document address the need for the provision of fire suppression and rescue services on the aerial structure and in subway sections of the system and identify which local fire suppression and rescue agencies are equipped and capable of providing timely and effective emergency services to the system and provide a police and fire substation and all necessary equipment and training at this end-of-the-line station.

Response. As stated on page 3.5-1 of the FRDEIR/S#2DEIS, the BART Emergency Plan (1994) and Train Operators Manual (1983) identify procedures for safe evacuation from all potential evacuation sites, including aerial structures and underground between stations. The BART Emergency Procedures Policy Vital Fire Protection Equipment, Communications and Training Agreement stipulates that local fire department services will be requested to respond during passenger emergency evacuation of BART trains. As part of the plan, the Millbrae Fire Department would be trained in safe evacuation procedures for both the aerial and subway portions of the alignment.

Emergencies requiring response from local fire departments are relatively rare, and the greatest demand on local services is the requirement to participate in BART fire training exercises. Fire departments in Daly City, Richmond, and El Cerrito, where BART service exists, were contacted regarding their experience. As reported in the Summary DEIR/SDEIS, on pages 3.5-12 and 3.5-13, these departments did experience an increase in their responsibilities, but an increase in staff or equipment was not warranted. Local jurisdictions cover the costs of these additional responsibilities.

Information collected since publication of the DEIR/SDEIS supports the conclusion that increases in calls for local fire and emergency medical services would be minimal under any BART build alternative, based on the experience of other communities served by BART stations. In the period from March to May 1995, emergency calls from the Richmond BART Station represented 0.0019 percent of the total calls received by the Richmond Fire Department. Calls from the El Cerrito Del

Norte Station represented 0.0023 percent of the total calls received by the El Cerrito Fire Department in the same period (Davena, 1995).

Since the incidence of police and fire department calls to the existing BART stations is extremely low, the provision of a police and fire substation by BART is not required. Such substations are not included at any other BART end-of-line stations, such as North Concord, Fremont, Dublin, Daly City, and Richmond, and experience at existing end-of-line stations has shown that they are not required.

- 7.17. The City requests that the document propose specific mitigation for the impact of the 16,000 construction truck trips on Millbrae streets.

Response. Truck access to the City of Millbrae laydown area under the Aerial Design Option LPA would be to and from Highway 101 via Millbrae Avenue. The maximum construction-related volume of 30 truck trips per hour, representing 15 trucks making round trips, would not cause significant traffic impacts. The 30 truck trips per hour maximum would only occur for an estimated two to three weeks, when excavation and concrete pours occur simultaneously. As described on page 3.13-19 in the FRDEIR/S#2DEIS, the average truck volume during most of the construction duration would be an estimated 5 to 10 trucks per hour. The hours and haul routes for construction-related truck traffic would be coordinated between the BART-San Francisco Airport Extension contractor and the City of Millbrae when the contractor obtains the necessary city permits.

- 7.18. Millbrae's Comments dated March 13, 1995 as submitted to BART and FTA still apply as appropriate to all portions of the draft document excluding the Aerial Design Option.

Response. Millbrae's earlier comments are responded to in Volume II of this FEIR/FEIS, beginning with Response 17.1 and continuing through Response 17.138.

- 7.19. With regard to Table ES-2, Comparison of Key Impacts, the following categories of issues are falsely stated to have the same impact as Alternative VI:

- Visual Quality, Built Environment
- Visual Quality, Scenic Resources and Significant Views
- Visual Quality, Sensitive Receptors
- Visual Quality, Streetscape

Response. Table ES-2 is meant to generally compare key impacts among the alternatives. The Aerial Design Option and Alternative VI have the same impacts from Colma to Angus Avenue in San Bruno. South of Angus Avenue, many impacts would also be the same; only impacts that were different or new under the Aerial Design Option are presented in the FRDEIR/S#2DEIS.

- 7.20. With regard to Table ES-2, Comparison of Key Impacts, the following categories of issues are falsely stated to have the same impact as Alternative VI:

- Community Services

Response. Community service impacts for Alternative VI and the Aerial Design Option are the same as presented in Table ES-2. Increases in demand for local emergency response, water supply, and wastewater treatment would be the same under either option.

- 7.21. With regard to Table ES-2, Comparison of Key Impacts, the following categories of issues are falsely stated to have the same impact as Alternative VI:

- Biological Resources, Reduction in Aquatic Habitat Value

Response. Table ES-2 in the FRDEIR/S#2DEIS is correct regarding impacts to aquatic habitat value. The intent of this table is to generally compare the nature of the impact among alternatives. As noted in Table ES-2 (page ES-20), all proposed alternatives except Alternative I (No Build) could result in additional drainage outfalls into existing waterways which could convey runoff and pollutants into aquatic habitats. The specific quantity and habitat values that would be affected differ, as discussed in Section 3.7 of the FRDEIR/S#2DEIS and in the DEIR/Technical Appendix.

7.22 With regard to Table ES-2, Comparison of Key Impacts, the following categories of issues are falsely stated to have the same impact as Alternative VI:

- Hydrology and Water Control, Flood Hazard
- Hydrology and Water Control, Soil Erosion
- Hydrology and Water Control, Water Quality
- Hydrology and Water Control, Groundwater

Response. Table ES-2 is intended to highlight significant and substantive differences among alternatives. While there may be some insignificant or insubstantial differences between Alternative VI and the Aerial Design Option with respect to flood hazard, soil erosion, water quality, and groundwater impacts, they are comparable in terms of severity. The most identifiable difference between Alternative VI and the Aerial Design Option is the placement of more facilities in the floodprone, west of Bayshore parcel under the Aerial Design Option. As discussed in Response 36.17, the effects would nonetheless be similar.

8. CITY OF SAN BRUNO

8.1. The FRDEIR/S#2DEIS states on page 2-17 in the third paragraph under "Other": "A traction power substation, train control bungalow, and a 25-foot radio antenna would be located at the site of the existing San Bruno CalTrain Station."...The FRDEIR/S#2DEIS fails to address the impacts of the above-stated structures and apparatus on the operations of the existing San Bruno CalTrain Station, including access and permanent loss of parking. It also fails to address the visual impacts and community cohesion impacts of such structures and apparatus on the adjacent neighborhood and elementary school.

Response. Since the proposed temporary relocation site for the San Bruno CalTrain Station would not create significant adverse effects, there is no need to consider an alternative relocation site. The effects of these ancillary facilities are discussed on pages 3.3-2 and 3.3-3. As shown in Figure 1 of the Design Appendix to the FRDEIR/S#2DEIS, the traction power substation, train control bungalow, and a 25-foot radio antenna are more accurately described as east of the CalTrain platform and west of the Armory and Lion's Field Park. This is the same location of the traction power substation, train control bungalow, and radio antenna under Alternative VI, which is described and fully evaluated in the DEIR/Technical Appendix. The traction power substation, train control bungalow, and radio antenna would not affect the operation or access to or permanent loss of parking of the San Bruno CalTrain Station. The DEIR/Technical Appendix, Section 3.3, Visual, page 3.3-89, finds that the traction power substation and train control bungalow would have insignificant visual impacts. The traction power substation, train control bungalow, and a 25-foot radio antenna would not separate or have community cohesion impacts on adjacent neighborhoods and Belle Air Elementary School. The DEIR/Technical Appendix does not identify the traction power substation, train control bungalow, and radio antenna as a significant impact in Chapter 5, Section 4(f) Evaluation.

As described on page 2-17 of the FRDEIR/S#2DEIS, the existing road alongside Lion's Field Park and terminating at 1st Street would be improved to access the car wash facility under the Aerial Design Option LPA.

The FRDEIR/S#2DEIS, page 2-17, describes that the existing road alongside Lion's Field Park and terminating at 1st Street would be improved to access the car wash facility under the Aerial Design Option LPA. Per a request from the U.S Fish and Wildlife Service the car wash facility has been moved out of the San Francisco garter snake endangered species habitat west of Highway 101 to an existing Daly City BART shop and yard. The placement of the car wash at the Daly City yard would have no significant impacts.

Text on page 2-7, paragraph two is revised as follows to indicate this design change:

Other. Traction power substations, ventilation buildings, gap breaker stations, train control bungalows, utility power feeds, and radio antennae north of Angus Avenue in San Bruno are the same as those described for Alternative VI in the DEIR/SDEIS, except the pocket track and car wash facility north of the Tanforan Station would be replaced by an auxiliary track and car wash facility in Colma San Bruno. The auxiliary track would be located adjacent to the existing Colma tailtracks and the Daly City Shop/Yard in Colma, ~~at grade parallel to and east of the CalTrain tracks between Santa Inez Avenue and Santa Clara Avenue in San Bruno.~~ The primary function of the auxiliary track would be to provide train access to the car wash facility, with a secondary function of train storage for up to two 10-car trains. ~~The rail car wash facility and support building would be located across from Santa Clara Avenue along the auxiliary track. The CalTrain right-of-way and the existing dirt road alongside Lion's Field Park and terminating at First Street, which would be improved, would be used to access this facility.~~

Under the Aerial Design Option LPA, the existing road alongside Lion's Field Park and terminating at 1st Street would still be improved to access the gap breaker station across from San Felipe Avenue.

- 8.2. Section 1.4 on parking also fails to address these issues, as well as any parking impacts which would occur as a result of moving the San Bruno Station to I-380 during construction.

Response. Chapter 3, Section 1.4, Parking Impact Assessment and Mitigation, in the FRDEIR/S#2DEIS does not address the impact of moving the San Bruno CalTrain Station to the I-380 location during construction because only operational impacts are addressed in this section, and construction impacts are addressed in Chapter 3, Section 13, Construction. The I-380 location for the temporary location of the San Bruno CalTrain Station is outside of the geographic study area of the FRDEIR/S#2DEIS which is the BART-San Francisco Airport Extension project corridor south of Angus Avenue. Figure 1 of the Design Appendix in the FRDEIR/S#2DEIS identifies that the San Bruno CalTrain Station would be relocated during construction. The temporary I-380 CalTrain station would include the same number of parking spaces, approximately 170 spaces, as provided at the current San Bruno CalTrain Station. These parking spaces would be provided under I-380 with primary access from San Mateo Avenue. The existing San Bruno CalTrain Station has 169 parking spaces with a weekday occupancy rate of 90 percent according to the CalTrain Parking Survey of June 1993. Please also refer to Responses 9.2 and S34.3 for discussion of the temporary relocation of the San Bruno CalTrain Station.

- 8.3. To avoid the environmental impacts cited above, these structures and apparatus must be relocated to an area south of the existing San Bruno CalTrain Station, beyond the existing fence line (at or near laydown area "C") and preferably east of the proposed sound wall, with paved access funded by BART and meeting San Bruno paving standards.

Response. Based on Response 8.1, the ancillary facilities in the vicinity of the existing San Bruno CalTrain Station would not result in significant adverse effects. Accordingly, there would be no reason to consider alternative locations for these facilities.

- 8.4. Adequate parking, lighting, vehicular and pedestrian access, and bus service must be incorporated into the design and operation of the new I-380 CalTrain Station. Adequate vehicular access must be provided at the I-380 CalTrain site during construction.

Response. The design details of the relocated San Bruno CalTrain Station would be coordinated with the City of San Bruno and the Peninsula Corridor Joint Powers Board (JPB). Please also refer to Response 8.2, for a discussion of parking impacts at the relocated station.

- 8.5. The FRDEIR/S#2DEIS also states on page 2-17: "...the pocket track and car wash facility north of the Tanforan Station would be replaced by an auxiliary track and car wash facility in San Bruno." There shall be no access to this car wash facility, which is located on the east side of the CalTrain tracks across from the residential area of Lomita Park, from either Huntington Avenue or San Antonio Avenue. Access to/from these residential streets for any purpose shall be prohibited.

Response. Please refer to Response 8.1 for a discussion of the car wash's relocation to the BART Daly City shop and yard. In addition, access to the BART gap breaker station location in San Bruno opposite San Felipe Avenue would not be from Huntington Avenue. Access would be from the north along the east side of the proposed BART tracks, as shown in the FEIR/FEIS Volume IV, Design Appendix. However, under the Aerial Design Option LPA, the existing road alongside Lion's Field Park and terminating at 1st Street would still be improved to access the gap breaker station across from San Felipe Avenue.

- 8.6. As part of the approved expansion of the San Francisco International Airport, the Highway 101 interchange with San Bruno Avenue is scheduled for reconstruction. The section of Highway 101 between San Bruno Avenue and Millbrae Avenue will experience significant congestion as a result of the airport's expansion. While the FRDEIR/S#2DEIS discussed the cumulative analysis of Alternative VI Aerial Design on the Millbrae Avenue/Highway 101 interchange, it fails to discuss the cumulative analysis of Alternative VI Aerial Design on the San Bruno/Highway 101 Interchange.

Response. BART-related traffic would have insignificant impacts on the San Bruno Avenue Interchange of Highway 101 under the Aerial Design Option LPA. The subarea traffic model used to evaluate traffic impacts in the FRDEIR/S#2DEIS indicated that BART patrons accessing the stations by private vehicles from south of Millbrae via Highway 101 would prefer to access the Millbrae Avenue Station under the Aerial Design Option LPA. The model also indicated that South San Francisco residents would not use Highway 101 to access a BART station, but would use local roads to the Hickey or Tanforan Stations. Please refer to Response 8.43 for further discussion of traffic impacts to San Bruno Avenue under the Aerial Design Option LPA. Please refer to Response 18.8 for a discussion of the analysis of the cumulative impacts of the SFIA Master Plan to the BART extension.

- 8.7. The proposed changes in the configuration of the Highway 101 ramps at San Bruno Avenue must be incorporated into the cumulative analysis for any future traffic circulation and design needs for San Bruno Avenue. Consideration must be given to the proper number of through-lanes, left-turn considerations, pedestrian sidewalks, bicycle paths, traffic signals, and landscaping.

Response. The San Bruno Avenue Interchange improvements are part of the SFIA Master Plan project and are not a component of the BART extension project. Please refer to Response 8.6 for further discussion of the proposed changes to the San Bruno Avenue Interchange.

- 8.8. The FRDEIR/S#2DEIS fails to adequately discuss the cumulative traffic and [emergency] safety impacts on the Angus Avenue crossing of CalTrain (and BART) as a result of establishing intensively used haul routes through the jogging intersection of Angus Avenue and First Avenue. During construction, BART must straighten this intersection in accordance with local paving and construction standards so that Angus Avenue's circulation is direct from Angus Avenue east of First to Angus Avenue west of Huntington Avenue.

Response. As shown in Table 3.13-2 of the DEIR/Technical Appendix, Angus Avenue would remain open during the construction period for normal and emergency traffic. Construction traffic impacts on San Bruno streets are not expected to be significant, as discussed in Impact 1, on page 3.13-19, of the FRDEIR/S#2DEIS. Therefore, improvements to Angus Avenue, such as realignment, are not included in the BART project.

Significant construction impacts to traffic on Huntington Avenue, San Bruno Avenue, and other local streets in this vicinity would be mitigated. BART would not, however, permanently realign Angus Avenue to eliminate the existing jog, because the BART alignment does not significantly impact either the Huntington/Angus or the First/Angus intersections. The Angus Avenue jog is an existing deficiency in the intersection's design, and improvements to the alignment are not warranted by any impacts created by the BART extension.

- 8.9. The FRDEIR/S#2DEIS fails to propose any bicycle paths along the BART alignment, contrary to actions by BART and SamTrans requesting such paths be incorporated into the BART alignment. Bicycle paths should link stations with adjacent communities, as well as provide a linear path along the alignment.

Response. The BART and SamTrans Boards of Directors have declared the importance of inclusion of a bikeway as a component of the BART extension and requested that the final design of the extension include this bikeway element. Since that declaration, staff has been analyzing how the existing project right-of-way could accommodate a bike path. BART is making efforts to contribute its own right-of-way toward the creation of a bike path. Please refer to Response S44.4 for further discussion of this issue, and to Volume I of the FEIR/FEIS for a general description of a proposed bike path utilizing BART right-of-way.

SamTrans and BART staff has also been in communication with local city staff, who are reviewing ways to link their communities to the BART stations with bike paths. The overall responsibility for development of a bike path outside the proposed BART right-of-way is beyond the scope of this transit development project.

- 8.10. The FRDEIR/S#2DEIS states on page 3.2-5 under paragraph 6: "Implementation of Mitigation Measure 1.3, i.e., creation and enhancement of wetland habitats onsite of the west of Bayshore parcel, recommended in Section 7, Biological Resources, the community garden located adjacent to Lion's Field Park in San Bruno would be displaced. (S)" The next paragraph correctly notes "the only measure available to reduce this impact to an insignificant level would be to select another optional site for wetland creation." The community gardens directly abuts Lion's Field and the play area of Belle Air Elementary School. Lion's Field is used intensively by all age groups in San Bruno. Converting the Gardens to a wetland would introduce an environmental use which would encroach into the recreational areas used by citizens in San Bruno and would create an attraction for young children which may not be in the children's best interest nor that of the wetlands and endangered species living there. The conversion of this site should be studied further, and another site must be chosen for creation of wetlands, if possible.

Response. Implementation of Mitigation Measure 1.3, Creation and Enhancement of Wetlands Habitat, could have resulted in the displacement of the community gardens site. However, after further consideration, the community garden site was rejected and one of the alternative sites (west of the CalTrain tracks in the vicinity of Santa Helena and Huntington Avenues in the City of Millbrae) was selected and approved by the USFWS. Please refer to Response 8.19 for additional discussion regarding potential safety risks to children associated with wetlands in the vicinity of Belle Air Elementary School.

- 8.11. The FRDEIR/S#2DEIS identifies the following impact on page 3.3-2 under paragraph 2: "Loss of scenic resources and changes to the streetscape along Huntington and San Antonio Avenue due to a

sound wall would be offset by proposed landscaping. (I)" Architectural design plans, as well as a specific landscaping plan, must be submitted to the City of San Bruno. The plan should identify plant species, location, and number of trees, bushes, shrubs, and vines for input and approval. The FRDEIR/S#2DEIS fails to state how many trees would be removed. BART shall be responsible for the maintenance of the sound wall and landscaping.

Response. The City of San Bruno and the County of San Mateo would be consulted during final design to ensure that station and landscape plans are satisfactory. The landscape plan would identify specific details of plant species to be utilized. As few trees as possible would be removed for the sound wall, but the exact number cannot be determined prior to the final design. BART would be responsible for maintenance of all its ancillary facilities, including sound walls and associated landscaping.

- 8.12. The FRDEIR/S#2DEIS identifies the following impact on page 3.3-2 in paragraph 4: "Above-ground ancillary structures located at the site of the existing San Bruno CalTrain Station would introduce new visual elements into the area; however, these elements of the Alternative VI Aerial Design Option would not significantly change the visual environment." (I)

The narrative following this impact notes that these structures are "relatively low, approximately 15-foot profile" and "would be screened from homes on Huntington Avenue by existing trees." The FRDEIR/S#2DEIS incorrectly states that there are existing trees along Huntington Avenue that would screen these structures. The structures would be on the site of existing CalTrain Station in San Bruno, which does not have any significant trees along Huntington Avenue which would block views. The structures would be visible from the residences on Huntington Avenue.

Response. Although the existing trees along Huntington Avenue may not completely screen the traction power substation from residents along this street, BART would provide landscape screening around the perimeter of these facilities wherever feasible. The ancillary facilities would therefore alter the visual setting for residents along Huntington Avenue. The residents are, however, more than 60 feet away, and as a result the visual impact would not be considered significant.

- 8.13. The FRDEIR/S#2DEIS fails to identify the visual impact of these [above-ground ancillary] structures from the residences on First Avenue and from recreational users at Lion's Field.

Response. The residences on 1st Avenue and the recreational users at Lion's Field would not be affected by the ancillary facilities, since the structures would be greater than 100 feet from residences. A residence or a park is considered a sensitive receptor because the enjoyment of the physical setting by users of these land uses is readily affected by changes in the visual environment. The DEIR/SDEIS and the FRDEIR/S#2DEIS use a 60-foot distance as the significance threshold for visual proximity and feelings of encroachment by residents. Please refer to Response 6.43 for the source of this criterion. Given the distance between the sensitive receptors and ancillary facilities and the proposed landscaping of these facilities, significant visual impacts are not anticipated. With respect to Lion's Field Park, recreational users include small youth using the playground facilities and older children and adults engaged in passive and recreational activities. The height and scale of the ancillary facilities would not cast shadows onto the playground over 55 feet away until the afternoon/dusk period. In addition, these facilities would not be visually incompatible with the park setting. Thus, enjoyment of the physical setting by users of Lion's Field would not be affected and no significant views or scenic resources would be obstructed.

- 8.14. The FRDEIR/S#2DEIS incorrectly states that such structures are "low profile." The Traction Power and Train Control Substation is between 150 and 175 feet long! To identify such a structure as having a 15 foot height without mentioning the 150-175 foot length is misleading to the reader of this document.

Response. The traction power substation and train control bungalow are long structures, but at a height of 15 feet, they can be considered low-profile, as are residences and businesses along Huntington Avenue of similar height. The DEIR/Technical Appendix, page 2-18, depicts the size of a traction power substation. The dimensions of other ancillary facilities are also described on page 3.3-31, Impact 6 of the same document. However, to clarify these dimensions under the Alternative VI Aerial Design Option, the following text is added to the end of the last paragraph on page 3.3-2 of the FRDEIR/S#2DEIS:

Although these structures are low-profile, the substation would occupy a plot of land with a 200x65x15-foot protective fence on the perimeter, and house two structures, one approximately 130x20x15 feet and the other 40x20x15 feet. An approximately 40x30x15-foot train control bungalow would occupy a plot of land with an approximately 80x60x15-foot perimeter fence. The ventilation building would be 165x50x20 feet. The vent shaft height would project 10 feet above finish grade.

- 8.15. As stated previously, [the Traction Power and Train Control Substation] must be located south along the BART alignment. They must also be adequately screened from the houses on Huntington Avenue.

Response. Ancillary facilities are spaced along the alignment to maximize power efficiency. The traction power and train control substations would be located on the east side of the alignment, approximately 100 feet from residences along Huntington Avenue. Landscape screening would be provided around the fenceline of these ancillary facilities, wherever possible, to reduce their visual effect.

- 8.16. FRDEIR/S#2DEIS identifies the following impact on page 3.5-1 for the aerial design: "Under the Aerial Design Option, it may be necessary to evacuate passengers during an emergency. Evacuation could be into unfamiliar surroundings or directly onto the aerial walkway. This potentially significant impact would be avoided by implementation of in-place procedures. (I)" The next paragraph states that the BART Emergency Plan (1994) "stipulates that local fire department services shall be requested to respond during passenger emergency evacuation of BART trains." The impact on the San Bruno Fire Department is potentially significant, given the small size of the City and its limited number of personnel. Response by the San Bruno Fire Department to emergencies at BART range from calls to station locations, to underground facilities, to at-grade facilities in wetland areas, and to aerial alignment in wetland areas and across Highway 101.

Response. The comment concerns passengers during an evacuation rather than the fire department's ability to respond. The anticipated impact to local firefighters is identified on page 3.5-9 of the Summary DEIR/SDEIS as minimal under Alternative VI and would be the same under the Aerial Design Option. The FRDEIR/S#2DEIS presents only new impacts that are different than those identified under Alternative VI. Thus, the impact to the San Bruno Fire Department was not restated in the FRDEIR/S#2DEIS.

- 8.17. Any apparatus, equipment, communication devices, or vehicles which must be purchased, upgraded, or acquired by the San Bruno Fire Department as a result of - or for the purpose of responding to emergency request by BART - must be supplied, purchased, or reimbursed by BART. Training on any of the above equipment or apparatus, and any training on special procedures necessary to respond to BART emergencies, must be supplied or reimbursed by BART. Any equipment, training and special procedures that may be required during the construction phase shall be provided before construction begins.

Response. Emergencies requiring response from local fire departments are relatively rare. The greatest demand on local services is the requirement that firefighters participate in BART fire training exercises. Local jurisdictions would cover the cost of these additional responsibilities. Emergency service support at existing high-traffic BART stations in Daly City, Richmond, and El Cerrito have

been accommodated by local jurisdictions without increases in staff or equipment. In spite of indications that emergency services have been provided at these stations with existing resources, circumstances at each jurisdiction may vary. It is uncertain whether additional resources would be required to accommodate an increased demand for local services.

BART will enter into cooperative agreements with all cities along the BART route and will be the primary respondent to emergencies associated with the system and stations.

- 8.18. For life/safety protection for the entire construction and operation of BART, whether for this segment of the alignment covered in the subject FRDEIR/S#2DEIS or for the segment covered in the DEIR/SDEIS, the San Bruno Fire Department [SBFD] requires[...compliance with SBFD construction, fee assessment, emergency procedure and design specification requirements.]

Response. BART will assure that the proper permits and specifications are identified in agreements that must be reached with the city for final design and reconstruction of city-owned utilities and facilities.

- 8.19. The FRDEIR/S#2DEIS states on page 3.7-5 under paragraph 1.3 "Creation and Enhancement of Wetland Habitats Onsite but Outside of the West of Bayshore Parcel.": "Other potential upland sites that may be converted into wetlands in the immediate vicinity of the west of Bayshore parcel would include the community garden site immediately north of Cupid Row Canal (approximately 1.4 acres)...If BART is able to purchase these properties or negotiate an agreement with the City of San Bruno..." The FRDEIR/S#2DEIS fails to assess the impact of this mitigation on the children of Belle Air Elementary School and on the recreational users of the Lion's Field Park. Creation of additional wetlands adjacent to areas used by young children would create a safety and environmental hazard that does not currently exist. Other areas for wetland creation and enhancement must be found.

Response. The FRDEIR/S#2DEIS identifies several locations for the replacement of wetland habitats, including the community gardens site in San Bruno. Conversion into a wetland would create an open space and would not create significant "safety" or "environmental" hazards and thus would not be considered incompatible with a school or park (similar to the open space on the west of Bayshore property which is now adjacent to these uses). Other properties for wetland creation and enhancement were also proposed to the U.S. Fish and Wildlife Service in the Biological Assessment and to the U.S. Army Corps of Engineers in BART's Section 404 permit application. (See Volume V of this FEIR/FEIS for summaries of the mitigation proposals submitted to these agencies.) In the final analysis, wetland creation at the San Bruno community garden is not necessary for mitigation of potential project impacts and has been dropped from further consideration. The alternative site west of the CalTrain tracks in the vicinity of Santa Helena and Huntington Avenues in the City of Millbrae was approved by the USFWS.

- 8.20. Please note that the community garden site referred to in the FRDEIR/S#2DEIS is owned by San Francisco International Airport, but located within the corporate limits of the City of San Bruno.

Response. The commentor is correct in stating that the community gardens (Yard Alternative A) described in paragraph 4 on page 3.13-6 of the FRDEIR/S#2DEIS are located in San Bruno but are owned by the SFIA. Paragraph 5, page 3.13-6, sentence 1, is revised as follows:

Alternative A, located in San Bruno and owned by the SFIA, is approximately 1.4 acres and would be located at the community gardens south of Lion's Field Park.

- 8.21. The City of San Bruno maintains a system of wells which helps to meet a substantial portion of its drinking water. It is essential that these wells be preserved and protected during construction.

Response. The FRDEIR/S#2DEIS references Chapter 3, Sections 8.2 and 13.2 of the DEIR/SDEIS for mitigation measures for flooding and water quality impacts, and impacts during construction, respectively. These mitigation measures will be incorporated into the Alternative VI Aerial Design Option, where applicable, to preserve the wells, water-treatment facilities, and other water quality apparatus owned by the City of San Bruno at the Corporation Yard. The potential for contamination of underlying aquifers is highest in areas where shallow perched aquifer contamination exists, and the proposed construction would extend below the shallow aquifer bottom sealing layer and into the underlying aquifer.

Contamination existing in the shallow perched aquifers along the alignment would be identified by project-specific geotechnical investigations and would be monitored during construction. If perched water is encountered during construction, it would be contained, tested, and discharged in an appropriate manner. In areas where the natural sealing layer is penetrated, sealants such as slurry walls, sealing grouts, or other appropriate methods would be used as best suited to the site conditions to minimize the commingling of underlying aquifers with shallow perched aquifers.

A water sampling and monitoring program of the existing aquifer to be performed by BART and the local water supply agencies will detect any significant long-term changes in contaminant levels in the water supply. Should monitoring detect the onset of aquifer contamination, the source of contamination will be identified and the contamination pathway sealed, if possible. Other possible mitigation measures include the removal or decontamination of the perched water. If any contamination is discovered during construction, the party or parties responsible for the contamination would be identified. The party responsible for removal and cleanup would be identified pursuant to applicable laws.

- 8.22. The wells, water treatment facilities, and all other water quality apparatus owned by the City of San Bruno at the Corporation Yard located at Huntington Avenue and San Felipe Avenue must be protected at all times. Any damage or degradation of water quality due to construction or operation of BART is the financial responsibility of BART.

Response. Please refer to Response 8.21 regarding protection of San Bruno water supply and water quality facilities.

- 8.23. The FRDEIR/S#2DEIS states on page 3.9-2 in paragraph 1: "Airborne noise from the at-grade segment of the Alternative VI Aerial Design Option would significantly affect San Bruno residents. (S)" The second paragraph under this heading states: "A sound wall that would obstruct noise from BART trains at the ground level or on the sidewalks would not be sufficient to minimize impacts at the second floor level of five to fourteen homes along San Antonio Avenue. They would still experience noise levels 5 [sic] to 7 dBA in excess of the criterion." The FRDEIR/S#2DEIS proceeds to state that the mitigation for this impact, i.e., "a Sound Barrier Wall 15 feet above grade along the CalTrain right-of-way" "would reduce this impact to an insignificant level." Reducing significant noise impacts on only half a house does not correspond to reducing the impacts to a level of insignificance!

Response. The conventional-height sound wall that would be provided along the CalTrain right-of-way would screen residents on the first floor of homes facing the tracks from excessive sound levels. Residences that are two stories high would require additional mitigation because the upper floor residents would still be exposed to excessive sound levels. The mitigation measure recommended in the FRDEIR/S#2DEIS would be to raise the conventional sound walls to a height of about 15 feet.

- 8.24. According to the 1993 Airport Land Use Planning Handbook, (page 7-19 under "Environmental Impact Assessment") as a guideline for considering when changes due to increased noise resulting from proposed or projected physical or operational changes at an airport, the FAA has established a screening criterion. "In noise-sensitive locations where the DNL already exceeds 65 dB, an increase of

1.5 dB is deemed the threshold of potential significance (FAA -1986). The FICON report expands upon this screening concept by recommending that a projected increase of 3.0 dB within an area exposed to a DNL of 60 to 65 dB also be subject to analysis and possible mitigation.” The FRDEIR/S#2DEIS fails to mention such criteria, appears to violate such criteria, and seems to base its proposed mitigation on inappropriate criteria.

Response. The FICON (Federal Interagency Committee on Noise) report is a background document that was used in preparation of the Airport Land Use Planning Handbook, which summarizes the information contained therein. The focus of the FICON report is specifically on the noise impacts of aircraft (individually as well as in the aggregate) as is the Airport Land Use Planning Handbook. The analysis for the proposed BART–San Francisco Airport Extension has thoroughly evaluated the impacts of individual trains as well as the cumulative impact of other community noise sources such as aircraft, street and highway traffic and commuter trains in conjunction with the noise which would be produced by BART trains for various alternatives proposed in the FRDEIR/S#2DEIS.

Senate Bill 1453, which added Section 21096 of the California Public Resources Code requires lead agencies proposing a project within two nautical miles of a public airport to use the Division of Aeronautic’s Airport Land Use Planning Handbook as “technical resources to assist in the preparation of the environmental impact report as the report relates to airport-related safety hazards and noise problems”. The threshold number of 1.5 dB cited in this comment arises from the following passage on page 7-19 of the referenced Handbook (1993 Airport Land Use Planning Handbook):

“As a guideline for considering when such changes might be significant and thus require thorough environmental impact review, the FAA has established a screening criterion. In noise-sensitive locations where the DNL already exceeds 65 dB, an increase of 1.5 dB is deemed the threshold of potential significance.” (FAA, 1986)

An environmental impact review of all of the noise sensitive areas potentially affected by noise from the implementation of the proposed BART project has been performed as presented in the DEIR/SDEIS and FRDEIR/S#2DEIS. Consequently, the action specified in the Division of Aeronautic’s Airport Land Use Planning Handbook (i.e., triggering of an environmental review) occurred without the need to apply a threshold criterion in order to make that determination.

Widely accepted criteria for evaluating noise impacts from individual transit trains and cumulative noise impacts associated with the proposed project and foreseeable future projects were applied to assess the level of noise impact. These significance criteria are discussed in the DEIR/Technical Appendix in Section 9.3 and presented in Table 3.9-3 and on page 3.9-14. Areas with sensitive receptors have been identified that would be exposed to a significant impact, and feasible mitigation has been proposed to reduce such impacts to a level that is less than significant.

- 8.25. The FRDEIR/S#2DEIS must reassess the impacts of noise on the adjacent residents of Lomita Park, especially those along Huntington Avenue and San Antonio Avenue based upon the more restrictive criteria established by S.B. No. 1453 and the 1993 Airport Land Use Planning Handbook. Any residence which cannot be fully and completely noise insulated by the construction of the proposed sound wall (including second-stories and above) must be noise insulated according to the criteria and acoustical methods currently employed in the Aircraft Noise Insulation Program as administered by the City of San Bruno.

Response. Please refer to Response 8.24 for a discussion of SB 1423 and the 1993 Airport Land Use Planning Handbook. Noise mitigation has been presented where significant noise impacts would be expected. The primary form of noise mitigation would be a sound wall. The appropriate sound wall would depend on the application (e.g., aerial structure, at-grade track). General details of the appropriate sound walls have been identified, though specific design details of sound walls would be determined during the final engineering phase of the project.

In all but one instance (refer to Response 8.23), a sound wall would be adequate to reduce the airborne noise impacts to affected receptors to a level that is less than significant, as discussed in the DEIR/SDEIS and FRDEIR/S#2DEIS. Where a sound wall situated at a particular location would not alone be sufficient to reduce the impact to less than the criterion (see Table 3.9-3 in the Technical Appendix), BART would explore other feasible and appropriate means of mitigating such impacts on a case by case basis. This process would occur during the final engineering design phase.

- 8.26. BART/SamTrans shall pay for the acoustical insulation of all such houses, whether that consists of full insulation or partial insulation (such as acoustic doors, windows and insulation only on the east side of the impacted residential units).

Response. Please refer to Response 8.25 for a discussion of airborne noise impacts and mitigation. Insulation of individual buildings would be considered on a case by case basis only if sound walls were found to be insufficient to mitigate noise. As indicated in the DEIR/SDEIS and FRDEIR/S#2DEIS, it is expected that sound walls would sufficiently reduce airborne noise impacts in all but possibly one situation. Alternative forms of mitigation and additional mitigation of this one impact would be explored in detail during the final engineering design phase of the project.

- 8.27. The FRDEIR/S#2DEIS also states on page 3.9-5 under paragraph 9: "The aerial guideways of Alternative VI Aerial Design Option would create airborne noise impacts for homes in San Bruno. (S)" Once again, the recommended mitigation is a 15-foot high sound wall for 16 to 20 homes with noise levels 2 DBA in excess of the residential criterion for airborne noise.

Response. The mitigation measure for Impact 9 on page 3.9-5 of the FRDEIR/S#2DEIS, as described in the comment, recommends constructing an aerial structure sound barrier wall (or equivalent measure achieving the necessary noise mitigation) rather than the 15-foot sound wall described in the comment. Such an aerial sound wall would reduce this impact to an insignificant level.

- 8.28. The FRDEIR/S#2DEIS fails to adequately address the noise impacts on the Belle Air Elementary School and Belle Air and Lomita Park residential areas as a result of pile driving activities for the aerial construction. These piles for the aerial construction must be drilled and not driven.

Response. According to the FRDEIR/S#2DEIS, the aerial structures would start approximately 1,500 feet south of the Belle Air Elementary School and would continue another 1,500 feet adjacent to the CalTrain right-of-way before the BART line turns east across the wetlands towards the SFIA. The foundations for the aerial structures would be drilled caissons, not driven piles, both along the right-of-way, and over the wetlands. The cut-off elevations for the drilled caissons and the concrete caps for the caissons would be below ground, so that sheet piles could be driven to provide for vertical walls for the foundation excavations.

Beginning at approximately the location where the BART line is passing San Benito Avenue, or approximately 3,000 feet from the school, an alternative may be exercised to build a temporary construction trestle bridge from which the aerial structures in the wetlands would be constructed. The temporary trestles would be supported by piles driven into the soil. Because specific entities (e.g., schools, hospitals) governed by local agencies have special concerns regarding construction noise and vibration, BART will explore the possibility of establishing special zones with more restrictive limits on noise and vibration than those presented in the DEIR/Technical Appendix in Tables 3.13-11 through 3.13-14.

In the cut-and-cover portion of the BART line, which is the closest to the school, soldier piles may be driven to allow for excavation with vertical walls. This type of pile driving, as well as any other types, is subject to stringent noise requirements specified in the BART Standard Specifications for Construction Contracts, Section 01500, Paragraph 1.12.A.3., titled "Noise Control."

At 3,000 feet away, maximum impact noise from typical pile driving should be between 65 and 70 A-weighted decibels (dBA). Please note that aircraft noise levels at Belle Air School are higher than this. Although noticeable, 70 dBA would not cause a significant noise impact for a school, such as Belle Air Elementary, and would be within the construction noise limits indicated as appropriate for the communities (such as San Bruno) in the project study area. For applicable construction noise limits, refer to Table 3.13-12, Intermittent Construction Noise in the Technical Appendix of the DEIR/SDEIS.

- 8.29 The FRDEIR/S#2DEIS discussion of "Cumulative Analysis" of noise on pages 3.9-6 and 3.9-7 is limited and may also be inconsistent with the criteria listed in the 1993 Airport Land Use Planning Handbook.

Response. The cumulative analysis in the FDEIR/S#2DEIS builds off the cumulative analysis in the DEIR/SDEIS. The cumulative analysis includes traffic, CalTrain service, and BART service. Please refer to Response 8.24 for a discussion of the criteria in the 1993 Airport Land Use Planning Handbook.

- 8.30 Any houses which experience noise levels above 1.5 dBA as a result of cumulative noise must be acoustically insulated at BART's expense according to the methods and procedures of the Aircraft Noise Insulation Program as sponsored by the City of San Bruno.

Response. Please refer to Response 8.24 regarding the use of 1.5 dBA as a significance threshold for cumulative impacts. Please also refer to Responses 8.25 and 8.26 for a discussion of noise insulation.

- 8.31 Each and every one of the three alternative construction and laydown yards directly impact the adjacent residential neighborhood, the Belle Air Elementary School, Lion's Field Park, the CalTrain Station, and the community gardens.

Response. Please refer to Responses 4.4 and 4.13, which acknowledges that there is a general concern regarding impacts on the community for all three alternative construction and laydown yards.

All construction activity for the proposed BART extension would require undeveloped areas for use as laydown areas situated at semi-regular intervals along the proposed alignment, in close enough proximity to the work areas to be of practical use by the contractor. Along most of the proposed alignment between Colma and San Bruno, sufficient unused space within the abandoned SPTCo railroad corridor and adjacent SFWD property has been identified to serve as laydown areas. However, once the route passes the Tanforan Shopping Center, much of the existing SPTCo railroad corridor is occupied by Peninsula Corridor Joint Powers Board tracks utilized by CalTrain and SPTCo. Also, much of the SFWD corridor in this southern reach is either leased to various businesses along the proposed alignment or is undeveloped land consisting of mature trees and brush. Further, the proposed BART alignment is along the easterly side of the CalTrain tracks in this area, and the SFWD corridor is along the westerly side, preventing the use of this corridor as a laydown area.

Between the Tanforan Shopping Center and Lion's Field Park, laydown areas must be located at the shopping center and near the park. The park property itself is not a desirable laydown area site because it would be inconsistent with Section 4(f) of the Department of Transportation Act, which seeks to avoid use of parklands, among other resources. Three potential laydown areas (A, B, and C) have been identified in the general area of the park, each with its own advantages and disadvantages, as summarized below.

Alternative A is approximately 0.6 miles from the work area, is about 1.4 acres in size, and is located on a community garden and community 4-H animal shelter. The northerly side of this site is also adjacent to the Lion's Field Park and Belle Air School playground. This site has the least usable construction laydown space due to its triangular shape. Utilization of this site would also require

displacement of the community gardens and 4-H club space, space which is unavailable in the immediate area, and would require visual and sound barriers to shield it from the park and school playground. An advantage of this laydown alternative is that it does not encroach into wetlands or sensitive species habitat.

Alternative B is approximately 0.7 miles from the work area, is about 3.0 acres in size, and is located east of the Belle Air School playground in the open area under and adjacent to the PG&E transmission lines. This site shares a common boundary with the Belle Air School playground and some wetlands, and contains sensitive species habitat. Fencing would be required to separate the yard from the wetlands and prevent sensitive species from accessing the site, visual and sound barriers would be required between the yard and the playground, site restoration would be required after construction, and site use would require off-site biological mitigation. The six PG&E high voltage transmission lines would also restrict the use of mobile cranes at this site. An operational advantage of this site is that its rectangular shape and size would provide for twice the usable space as Alternative A.

Alternative C would be located in the undeveloped upland area west of Highway 101, just south of the Cupid Row Canal and east of the existing CalTrain tracks and proposed BART mainline tracks. Like Alternative B, this site is about 3.0 acres in size. It also contains wetlands and sensitive species habitat. The wetlands area may have to be fenced off to prevent contractor access, and restoration could be required after construction. The entire site would also have to be fenced off to prevent sensitive species from entering the site, and use of the site would lead to the requirement for off-site biological mitigation. An operational advantage of this site is that it is further from Lion's Field Park and the Belle Air School and would not conflict with the community garden or 4-H space.

BART has selected the Alternative C laydown area following additional liaison with the appropriate local, state, and federal jurisdictions. This coordination resulted in proposing site access and haul routes to Highway 101 and thus avoiding the City of San Bruno, San Bruno Park School District lands, and the Belle Air neighborhood that minimize construction-related impacts to the area. Suitable mitigation measures to minimize and compensate for all significant unavoidable impacts associated with the Alternative C laydown area have been developed in consultation with the USFWS and are presented in the Biological Assessment and Biological Opinion in Volume V.

- 8.32. The FRDEIR/S#2DEIS cites the following impacts on pages 3.13-19 through 3.13-21 regarding Transportation and Land Use:

"The addition of construction vehicles on surface streets would impact traffic circulation. (I)"

"Construction activities at the contractor laydown areas in San Bruno would disrupt adjacent neighborhoods." (S)

"Construction activities at laydown yard Alternative A and associated truck trips would disrupt the Belle Air neighborhood in San Bruno. (S)"

The FRDEIR/S#2DEIS states on page 3.13-19: "Haul routes will be coordinated and predetermined by agreements with local authorities prior to construction."

Any temporary laydown yard as depicted on Figure 3.13-3 must be coordinated with the San Bruno Park School District (Belle Air Elementary School) and provide an access and haul route directly from Highway 101 with no access through local neighborhoods.

Response. Please refer to Response 6.60 for a discussion of coordination efforts with local jurisdictions to minimize construction-related transportation impacts. Impacts would be minimized through the working relationships that would be established with the City of San Bruno, its businesses, and the Belle Air neighborhood. During preliminary engineering, the access and haul routes to these areas would be finalized to select routes that would cause the least impact to the community. An access and haul route that would connect to Highway 101 would avoid use of local San Bruno streets

to access the contractor laydown area. Please refer to Response 8.31 for a general discussion of the alternative contractor laydown areas.

- 8.33. Any temporary laydown yard as depicted on Figure 3.13-3 must be coordinated with the San Bruno Park School District (Belle Air Elementary School) and provide an access and haul route directly from Highway 101 with no access through local neighborhoods. Any laydown area involving City-owned land or right-of-way shall be subject to fees, charges, assessments, temporary reconstruction costs, and/or reconstruction requirements by the City on BART/SamTrans and its contractors and subcontractors.

Response. Please refer to Response 8.31 for a general discussion of the alternative laydown areas, and for a discussion of coordination efforts regarding the use of the selected temporary laydown yard with the San Bruno Park School District (Belle Air Elementary School). Any and all local "fees, charges, assessments, temporary reconstruction costs, and/or reconstruction requirements by the City," where appropriate, may become part of a comprehensive agreement with the City, as noted in Response 8.18.

- 8.34. In addition, it must be specifically understood that any agreement on local haul routes in San Bruno shall require [...] compliance with all required permitting procedures, assessments and fees, insurance requirements and design specifications].

Response. Please refer to Response 8.32 regarding agreements on local haul routes.

- 8.35. The paragraph under "Construction Storage Yard and Staging Area" incorrectly states that the Alternative A site is owned by the City of San Bruno. It is owned by SFIA.

Response. As noted in Response 8.20, this error has been corrected.

- 8.36. In making its "preferred" alternatives, the FRDEIR/S#2DEIS evaluates the impacts on the wetlands to the detriment of the children attending the Belle Air Elementary School. There is sufficient room to allow access from any of the laydown areas directly to the access road along Highway 101 without using local residential streets and severely impacting the elementary school and the residential neighborhood, while at the same time preserving the main wetland areas.

Response. As discussed in Response 8.31, all concerns from interested parties will be factored into a decision about which temporary construction laydown yard (Alternative A, B or C) would be used, how the selected yard would be used, and which access and haul routes to the selected yard would be used. Protecting the children in the Belle Air Elementary School and the residents of the Belle Air neighborhood from adverse local construction activities and uses of the selected yard is recognized as a primary concern. As stated in Responses 6.60 and 8.28, every effort would be made to accommodate and satisfy the concerns expressed.

- 8.37. San Bruno maintains that the first level of priority in assessing impacts is the safety of children attending the Belle Air Element School and not 0.70 to 1.50 acres of wetlands. The children attending school, the residents of Belle Air, and recreational users of Lion's Field must be given consideration when selecting construction yards, staging and laydown areas, and haul routes.

Response. Please refer to Response 8.31 for further discussion on selection of construction and laydown yards in light of community impacts.

- 8.38. The FRDEIR/S#2DEIS must consider the cumulative impacts on the Belle Air Elementary School, including location of laydown areas, location of traction power substation, wetland conversions, haul routes, and other construction impacts involving noise, vibration, debris, dust, safety, and overall capability of operating an elementary school, including indoor classroom activities, outdoor recreational activities, and safe walking and transporting of young children during and after

construction. BART and SamTrans must work cooperatively with the San Bruno Park School District all times during the planning phase and the construction phase to assure that these impacts are fully mitigated.

Response. Each of the identified construction impacts listed in the comment would be addressed through implementation of mitigation measures. Please refer to Response 8.3 for a discussion of the impacts associated with the traction power substation in the vicinity of the Belle Air School. Please also refer to Response 8.31 for a discussion of the laydown areas and Response 8.32 for a discussion of the haul route in the vicinity of the Belle Air School.

Belle Air Elementary School would be considered a “special zone” under the Aerial Design Option LPA. Impacts 1 and 2 on pages 3.13-36 and 3.13-37 of the FRDEIR/S#2DEIS address noise impacts in the vicinity of the Belle Air School. If 1st Avenue is used as a haul route, then the mitigation measure under Impact 1 would apply and a temporary road and wall would be constructed to separate construction-related trucks from other vehicular traffic to reduce truck noise to an insignificant level. If truck traffic traveled directly to Highway 101 using a temporary road, then this would not result in significant noise impacts as stated in Impact 2.

Dust generated during construction activities would be minimized through the implementation of Mitigation Measure 1.6, Best Construction Practices, described on page 3.13-199 of the DEIR/Technical Appendix. These practices include watering and/or use of soil stabilizers, prompt replacement of ground cover in disturbed areas, enclosure and coverage of soil stockpiles, coverage of truck beds during hauling of soil, street sweeping, use of wash trucks or wheel washers, and limitation of traffic speeds to 15 mph or less in unpaved areas. Please refer to Response 11.1 for a discussion of construction-related air quality impacts.

Please refer to Response 8.33 for a discussion of coordination of mitigation efforts with the school district.

No significant operational impacts would occur under the Aerial Design Option LPA on Angus Avenue or on Huntington Avenue from San Bruno Avenue to the south in the vicinity of the Belle Air School.

- 8.39. With the aerial Wye design option of BART into SFO, the frequency and scheduling of BART trains into SFO becomes critical. The operating characteristics are described on pages 2-18 and 2-19 of the FRDEIR/S#2DEIS. These scheduling and operating characteristics, especially off-peak hour trips, holiday and weekend schedules could create significant adverse impacts on San Bruno, its local streets, and its BART Station at Tanforan Park Shopping Center.

Response. On Saturdays, BART would operate direct service to Millbrae until late night. Late night weekdays, Saturdays, and all day Sunday, the shuttle service would not operate, and the Concord route through San Francisco would provide service from Millbrae to the new Airport International Terminal. It is possible that late night Saturday and Sunday weekend travelers from the south to San Francisco or other points on the BART system may drive to the Tanforan Station instead of the Millbrae Avenue Station to access the BART system. The 1,000-space parking facility planned for the Tanforan Station is designed to accommodate projected Metropolitan Transportation Commission (MTC) weekday year 2010 demand, plus 25 percent for day-to-day variations. It is anticipated that there would be sufficient parking supply to accommodate demand, even if some Sunday and late night Saturday patrons park at Tanforan instead of the Millbrae Station. None of the BART stations with parking lots, including the end-of-line stations, are filled to capacity on Sundays or late night Saturdays.

The commentor is suggesting that the BART station in San Bruno would become, in essence, an end-of-line station during off-peak hours, when BART trains operate on the “X” schedule. This off-peak schedule has all southbound BART trains traveling from the Tanforan Station into the SFIA

and then to the Millbrae Avenue Station, while all northbound BART trains travel from Millbrae to the SFIA and then to San Bruno. The decrease in patronage during the off-peak hours is so great compared to the A.M. and P.M. peak hours that the traffic impacts during the off-peak hours would not be greater than those analyzed during the peak hour, even if the Tanforan Station did become a de facto end-of-line station during off-peak hours. However, the Tanforan Station is unlikely to function as an end-of-line station during off-peak hours because many patrons would still choose to park at the Millbrae Avenue Station at this time, even though BART trains do not operate directly between Millbrae and San Bruno. Reasons patrons might choose the Millbrae Avenue Station under the Aerial Design Option LPA include easier access from Highway 101; varying priority during off-peak hours, and thus willingness to travel longer; the opportunity to view the area from the BART train on the aerial alignment into the airport; and so on. While some BART patrons may prefer to drive to the San Bruno BART Station during the off-peak hours rather than to the Millbrae Station, this activity would not result in any significant environmental impacts.

- 8.40. As riders learn that all BART trains stop at Tanforan, whether they proceed into the Airport or to the Millbrae Station, a portion of the riders from the south will go to Tanforan as opposed to Millbrae to save time, since they will not have to go into the Airport and switch to the southern Wye train to get to Millbrae. This is intensified during off-peak hour trips, holiday and weekend schedules. All impacts are magnified during the Christmas shopping season, from Thanksgiving to New Year's, since the Tanforan Station is located at a shopping center which has heavy traffic flow during this period. The Tanforan BART Station and its surrounding local street capacities and traffic circulation patterns are not designed to accommodate regional traffic impacts under the above-cited scheduling scenario.

Response. Please refer to Response 8.39 for a discussion of the Tanforan Station functioning as an end-of-line station during off-peak hours and Sundays.

- 8.41. The FRDEIR/S#2DEIS fails to address the environmental impacts on San Bruno as a result of weekend, holiday, or off-peak scheduling of trains into SFO, thereby placing a greater demand on local streets for regional use of the San Bruno BART Station, especially by patrons driving from the south and using San Bruno Avenue and Huntington Avenue as access from Highway 101.

Response. Please refer to Response 8.39 for a discussion of the Tanforan Station functioning as an end-of-line station during off-peak hours and Sundays.

- 8.42. Since all BART trains stop at Tanforan, whether they proceed into SFIA or go to Millbrae, BART must analyze the impacts of weekend, holiday, and off-peak scheduling of trains into SFIA relevant to increased traffic impacts on San Bruno Avenue and Huntington Avenue for BART patrons driving from the south.

Response. Please refer to Response 8.39 for a discussion of the Tanforan Station functioning as an end-of-line station during off-peak hours and Sundays.

- 8.43. BART must pay its proportionate share of improvements necessary to redesign, widen or otherwise physically improve San Bruno Avenue as a result of this increased traffic.

Response. Traffic related to the BART extension was not found to have any significant impacts to traffic operations on San Bruno Avenue, either between Highway 101 and Huntington Avenue or between Huntington Avenue and El Camino Real. The subarea traffic model analysis indicated that none of the intersections along San Bruno Avenue would have significant traffic impacts under the Aerial Design Option LPA. An increase in the volume-to-capacity ratio of 3 to 5 percent for the intersections along San Bruno is not significant when they are operating at LOS A or B. Since no significant increases in traffic are expected, BART will not pay to improve San Bruno Avenue.

- 9.1. Page 3.13-19: The BART extension will share the CalTrain right-of-way between approximately I-380 and the Millbrae station. Construction of the BART project will clearly impact CalTrain operations. The nature and extent of these impacts needs to be identified along with appropriate mitigation measures. Section 1.2, Transit Impact Assessment and Mitigation needs to provide a description of impacts on CalTrain.

Response. Although CalTrain service would be disrupted with minor delays, the following additional and revised mitigation measures would reduce the impact to a less than significant level. Please also refer to Response 9.4 for discussion of impacts to CalTrain speeds during BART construction.

Impact 17 on page 3.13-51 of the DEIR/Technical Appendix is revised as follows:

17. *Construction activity would disrupt CalTrain service. (S)*

Between ~~Forest Lane~~ the I-380 overpass and ~~San Bruno Avenue~~ Cupid Row, the western CalTrain track would be taken out of service for 12 to 18 months. CalTrain service would continue on a single track. Construction of the Hillcrest Boulevard underpass of the CalTrain tracks would take about four months and ~~may cause delays to CalTrain service~~ CalTrain service would continue on two tracks.

Relocation of CalTrain tracks in the vicinity of the Millbrae Station would require approximately four months.

MITIGATION MEASURES. The following measures would reduce construction impacts to CalTrain service. Minor delays would be insignificant ~~remain significant and unavoidable.~~

On page 3.13-51 of the DEIR/Technical Appendix, the following text is added to the end of Mitigation Measure 17.1:

All shooflies will be equipped with power switches and the controls tied into the automatic block signal system to avoid major delays.

On page 3.13-52 of the DEIR/Technical Appendix, the name of the mitigation measure is revised as follows:

- 17.4 *Maintain Two-track Operations During Construction at Hillcrest Boulevard and Millbrae Station.*

On page 3.13-52 of the DEIR/Technical Appendix, the following text is added at the end of Mitigation Measure 17.4:

Temporary shooflies will be used at these locations to maintain train operations on two tracks.

- 17.5 *Temporary Relocation of San Bruno Passenger Station. During construction of the subway, the existing CalTrain station platforms, shelter, and parking must be moved to the vicinity of the I-380 overpass. Upon completion, the station facilities would be moved back to the existing location.*

- 9.2. Page 3.2-2: The design appendix shows that the CalTrain San Bruno station would be relocated and the CalTrain mainline would be relocated. The analysis needs to include the duration of the relocation, where the interim San Bruno Station would be relocated and what provisions would be made for CalTrain patron parking.

Response. The permanent relocation of the existing San Bruno CalTrain Station to a site under I-380 is part of the project definition for the 1992 Locally Preferred Alternative (LPA) and Alternatives II (TSM) and III (Base Case), and as described in the DEIR/Technical Appendix. The existing San Bruno CalTrain Station would also be permanently relocated to a site under I-380 under the Alternatives 2 (TSM) and the BART build Alternatives 3, 5, and 6 in the AA/DEIS/DEIR. Both the AA/DEIS/DEIR and DEIR/Technical Appendix evaluated and did not identify any significant adverse effects from the permanent CalTrain relocation.

Figure 1 of the Design Appendix in the FRDEIR/S#2DEIS shows that the San Bruno CalTrain Station would be relocated during construction. The temporary relocation of the San Bruno CalTrain Station is shown in Figure 9A of the FEIR/FEIS Volume IV Design Appendix. The existing San Bruno CalTrain Station would be temporarily relocated under the I-380 superstructure during construction of the Aerial Design Option LPA. Temporary parking would be provided in this same area. After construction of the Aerial Design Option LPA, the San Bruno CalTrain Station would be relocated to its existing location. The space under the structure would be leased from CalTrans to provide an equal number of parking spaces. Primary access would be from San Mateo Avenue. As under the permanent relocation, there would be no significant adverse effects associated with the temporary relocation of the San Bruno CalTrain Station to under I-380. Also see Responses 8.1, 8.2, 11.3, 70.8 and S34.3 for additional information on the San Bruno CalTrain Station.

The duration of relocation would coincide with construction of the subway through San Bruno. Once construction has been completed, the original San Bruno CalTrain Station would be restored. A construction duration of approximately 24 months is anticipated.

- 9.3. The [Peninsula Corridor Joint Powers Board] JPB requests that BART construct the CalTrain tracks in their permanent location during the first phase of the project in order to minimize the amount of temporary disruption of the CalTrain mainline and stations. If this is not possible, the staging plan for interim relocation of CalTrain facilities need to be identified.

Response. A detailed track relocation staging plan will be developed during preliminary design and coordinated with CalTrain staff. Every effort will be made to minimize the number of moves and disruption to CalTrain operation.

- 9.4. Does BART believe that CalTrain would need to reduce speeds through the project area while construction is taking place? How much of a speed reduction is assumed by BART? What impact will this have on train running times? As with all other projects along the right-of-way, it is the JPB's position that train schedules are not to be adversely impacted by nearby construction.

Response. The need to temporarily relocate CalTrain tracks and the use of shoeflies would be the construction activities which cause potential delays in CalTrain service. All temporary relocations and shoeflies would be designed in accordance with the requirements and train speeds specified in the CalTrain design criteria. Single tracking may occur during the course of construction between crossovers that would be approximately one mile apart. Such single tracking would be limited to one location at any one time during construction of the BART extension. When a train crosses over from one track to another, its speed is governed by the crossover design, typically 27 mph.

CalTrain travels at an average speed of approximately 50 mph through the reach between San Bruno and Burlingame, the area subject to construction impacts. For train speeds cited above, the resultant delay from one mile of single tracking would be approximately one minute, based on a travel speed of

27 mph for 2.2 minutes. The delay period is within the tolerance of CalTrain schedules and should not be a major inconvenience to its patrons, based on conceptual engineering done for the environmental document, all of the BART build alternatives, except for Alternative III, would have similar impacts to CalTrain service. Alternative III would have less impact to CalTrain service than the other BART build alternatives.

- 9.5. Page 3.13-6: During construction the JPB will require that BART and its contractors strictly adhere to construction procedures in the JPB's Standards Manual. Furthermore, BART will be expected to pay all JPB costs associated with operating through a construction site, construction supervision, flagging services, etc.

Response. BART, SamTrans, and the project contractors will review the construction plan in conjunction with requirements of the Peninsula Corridor Joint Powers Board (JPB) Standards Manual, and will work closely with JPB to minimize construction impacts to JPB operations. The construction procedures to be followed by the BART contractors would consist of procedures developed and approved by all governing agencies, including those from JPB. BART would pay for construction supervision, flagging, etc. only as it relates directly to construction of the BART facilities. BART would not pay for activities performed by other public agencies.

Sponsors of the BART–San Francisco Airport Extension project also acknowledge JPB's requirement for approval of excavation plans adjacent to CalTrain tracks.

- 9.6. How would the cross platform connection between CalTrain and BART work in terms of fare collection? For example, how would exiting BART passengers put their tickets through the "fare gates" before boarding the CalTrain? Would there be faregates on the "cross platform"? Likewise, how would exiting CalTrain passengers purchase and validate BART tickets on the "cross platform"?

Response. The cross-platform transfer between CalTrain and BART is being designed to include faregates between the CalTrain and BART portions of the platform. Decisions on fares, including fares involving transfers between BART and CalTrain, would be made by the JPB and SamTrans in conjunction with BART.

One possibility for CalTrain passengers who transfer to BART would be to receive their BART transfer ticket at the time that they purchase their CalTrain ticket. In addition, BART tickets would be available to all patrons before entering a BART platform. An in-depth ticket management study would be required if the BART extension project is adopted. BART fares are based on distance traveled, while CalTrain uses a zonal system for pricing; thus, an equitable fare must be determined. CalTrain fares are verified by conductors on trains, while BART uses automatic fare collection without conductors.

- 9.7. In the patronage modeling, what assumption was made for the transfer time between CalTrain and BART at the Millbrae Station?

Response. The Metropolitan Transportation Commission (MTC) model assumed a two-minute walk time between the CalTrain platform and the BART platform, plus a wait time for the next BART train equivalent to half of the BART headway in the case of transfers from CalTrain to BART, or half of the CalTrain headway in the case of transfers from BART to CalTrain. During the peak commute period, the wait for the next BART train was assumed to be 2.25 minutes, or half of BART's 4.5-minute headway, for a total 4.25-minute transfer time from CalTrain to BART under Alternative VI. Under the Aerial Design Option LPA, the wait time for the next BART train would be half of the 6.75-minute headway, or a 3.37-minute wait time, plus the 2-minute walk time, for a total 5.37-minute transfer time from CalTrain to BART.

- 9.8. From an operations standpoint, how will CalTrain passengers be provided with a free transfer to the airport via the BART shuttle? At times when the BART shuttle will not be operating, how will CalTrain passengers going to the airport be allowed to transfer to the airport for free while CalTrain passengers going beyond the airport will be charged? BART should examine a third BART track at the Millbrae Station for the shuttle operation.

Response. Decisions on fares, including fares involving transfers between BART and CalTrain, would be made by the JPB and SamTrans in conjunction with BART. BART service between the Millbrae Avenue Station and the San Francisco International Airport (SFIA) would be available during the same hours as service between the Tanforan Station and the SFIA. The provision of free transfers for CalTrain riders traveling to the SFIA could be made possible through machines on CalTrain trains that issue BART tickets valid only between Millbrae and the SFIA, with certain time restrictions. The latest Millbrae Station design includes a third track. This design is shown in Volume IV of this FEIR/FEIS.

- 9.9. How would airport passengers and well wishers be prevented from parking in the Millbrae station parking facilities and taking BART shuttle to the airport.

Response. Preventing overnight parking at BART stations along the BART extension would virtually eliminate air passenger parking, though short-term visitors to the airport (such as well-wishers) would not be affected by this measure. Air passengers who leave and return on the same day are overwhelmingly business travelers who are time-sensitive rather than cost-sensitive. The cost savings of parking at BART would not be adequately compensated by the travel time difference of parking at the airport or at a satellite parking facility. The market for one-day air passengers who travel on personal business, where cost savings outweigh time savings, is a very small number of people and would be accommodated by the surplus of parking spaces supplied, beyond the spaces predicted by the BART's modeling effort.

It should be noted that FTA does not allow its funds to be used to provide for air passenger parking at its transit stations. Overnight parking will not be allowed at the stations along the BART extension. The DEIR/SDEIS has identified the potential for the one-day air passenger to park at certain BART stations rather than park in airport lots. To prevent airport passengers parking at BART stations, Mitigation Measures 6.1 and 6.2, on page 3.1-169 of the DEIR/Technical Appendix, would establish a monitoring program and certain parking restrictions, pricing surcharges, and other administrative mechanisms if the displacement of BART and CalTrain parking patrons proves to be a problem at BART stations.

A surcharge between the BART extension stations in South San Francisco, San Bruno, and Millbrae would be considered only as a last option. Mechanisms that specifically link this surcharge only to those who park at one of the BART extension stations and then take BART to the airport would be thoroughly investigated, because the intent of these mechanisms is not to penalize patrons who walk, use transit, or are dropped off at one of these BART extension stations.

- 9.10 Please clarify the service patterns BART will operate and how the cross platform connection would work under each service pattern.

Response. The conceptual operating plan and service patterns for the Aerial Design Option LPA are described in Section 2.2, Route Description and Alignment, of the FRDEIR/S#2DEIS. A cross-section of the Millbrae Avenue BART/CalTrain Station with the cross-platform transfer is shown in Figure 2-12 of the same document. As shown in this figure, there would be one BART/CalTrain cross-platform for transfers; other BART and CalTrain platforms would be connected via an aerial bridge.

During the A.M. peak period northbound, BART would be routed for a cross-platform transfer with CalTrain. Southbound transfers between BART and CalTrain would require an overhead crossing

between platforms, unless the JPB could cross southbound trains to the northbound track in the area of the Millbrae Station. During preliminary engineering, BART would examine, with the JPB, the possibility of a southbound crossover.

Weekdays and Saturdays except nights, BART would provide a dedicated shuttle train operating between the Millbrae and Airport Stations. The BART shuttle train between the Millbrae Station and the airport would be routed for cross-platform transfers between CalTrain and BART, where feasible. The BART shuttle service would be scheduled to coordinate with CalTrain northbound arrivals and southbound departures.

Late night weekdays and Saturdays and all day Sunday, BART would provide two-route "X" service, with trains from North Concord to the West Bay and trains from Richmond to Fremont. During these times, the BART shuttle service would not operate, and the Concord route through San Francisco would first provide service to the airport, and then service the Millbrae Station on 20-minute headways. From Millbrae, BART trains would first be routed into the airport and then north towards San Francisco and the East Bay.

The average expected headways for the Aerial Design Option LPA are described on page 2-18 and summarized in Table 2-1 of the FRDEIR/S#2DEIS.

- 9.11. The JPB is currently studying linking the ALRS with CalTrain. The study will review potential options for linking the two systems including impacts on the BART extension proposal. Should the JPB's selected option impact the BART extension proposal in terms of BART's desired use of the CalTrain right-of-way, then the JPB will work with BART to minimize those impacts.

Response. If the JPB, at the conclusion of the *CalTrain-San Francisco International Airport Light Rail System Connection Feasibility Study* selects an option that impacts the BART extension, the JPB will work with BART to minimize those impacts. Please refer to Response 13.4 for a discussion of the Airport Light Rail System (ALRS) connection to CalTrain.

- 9.12. If the ALRS is deemed desirable, and to avoid duplication of services, how would elimination of the BART Millbrae to SFO shuttle impact the BART project?

Response. The elimination of the BART shuttle between the Millbrae Avenue Station and the SFIA would have serious consequences to BART operations. The Millbrae leg of the wye is an essential and integral part of BART's operations and would be included irrespective of the need for shuttle service. This is because the elimination of the south leg of the aerial wye would eliminate BART's ability to run "X" service during specified weekend and off-peak periods. This service would run BART trains from the Tanforan Station to the Airport International Station, then to the Millbrae Avenue Station with the return trip to the SFIA and back to Tanforan. The "X" service eliminates the need to split service between the SFIA and the City of Millbrae during off-peak periods. "X" service would run approximately ten hours per off-peak week day and probably all day on weekends.

- 9.13. Grade Separations - CalTrain has a long standing program to grade separate crossings. The JPB recommends that BART remain at grade until south of Center Street so that Center Street can be built as an underpass of both CalTrain and BART tracks.

Response. BART will cooperate with the JPB on alignment planning at Center Street, which would allow each agency to construct a grade separation. The BART profile for an underpass at Center Street reduces real estate impacts to adjacent neighborhoods. BART considered at-grade construction; however, third rail exposure would require fencing on each side of the right-of-way, thus isolating the subdivision from any access.

- 9.14. It is currently San Mateo County Transportation Authority policy that CalTrain construct a third track to facilitate express train operation. The JPB expects that the BART design will not preclude the ability to maintain the three track policy.

Response. Future CalTrain improvements, such as construction of a third track, would not be precluded by construction of the proposed BART extension. As a result of further refinement to the project, the location of the sound wall that would be adjacent to the at-grade portion of the BART alignment along San Antonio Avenue was revised from the FRDEIR/S#2DEIS to the FEIR/FEIS. The placement of the sound wall would be between the CalTrain alignment and the BART alignment which would allow space for CalTrain's potential third track.

- 9.15. One of CalTrain's future improvements is electrification. In order to enable electrification CalTrain, BART must provide adequate vertical and horizontal clearance envelope. ...The total horizontal width required by CalTrain is approximately 44 feet (allowing 4' from the centerline of the electrification side pole to the edge of the right-of-way.)

Response. The design of BART facilities on the JPB/CalTrain right-of-way would not preclude the future electrification of CalTrain. In restricted areas, such as the Millbrae Station, excess lands of the San Francisco Water Department could be used for this improvement.

- 9.16. We will require a more precise description of construction techniques to be utilized for the segment in which the project adjoins the CalTrain right-of-way in San Bruno and extends to the Millbrae Station. The JPB is particularly interested in how these construction methods would impact CalTrain operations.

Response. There are three probable methods that would be selected by BART and the contractors for supporting the cut-and-cover operation through San Bruno to Millbrae. These methods include soil-enhanced walls, slurry walls, and soldier piles and lagging.

Any of these methods would protect the CalTrain tracks from contractor disruptions and settlement of adjacent property. The slurry wall and the soldier pile and lagging methods are traditional techniques used regularly for similar operations, while the soil-enhanced wall is a newer technology.

These three methods would be suitable for the subway reaches adjacent and parallel to the CalTrain tracks through San Bruno to Millbrae. The aerial wye design into the SFIA would not have an impact to CalTrain, since this reach moves off the CalTrain/Southern Pacific Transportation Company (SPTCo) right-of-way to the east. The at-grade reach parallel to CalTrain in the area of the aerial wye will be constructed with a structural barrier between BART and CalTrain, as a requirement of BART.

The preferred cut-and-cover supporting method would be to use a soil-enhanced wall to support both sides of the excavation. It has been determined that augered and soil-enhanced walls (through soil mixing), extending one-third to one-half the excavated depth below the bottom of the excavation, would provide a relatively dry hole. The soil-enhanced walls would be structurally supported internally with several layers of walers, struts, and braces, instead of tiebacks, so that the CalTrain zone of influence is not penetrated.

The placement of the soil-enhanced walls is typically an independent operation from the excavation and wall support operations. The augering/mixing and placement of soldier beams in the walls would be performed with the equipment almost exclusively inside the excavation limits. The equipment driving the augering operation would be run with electric motors that produce a relatively low noise level. The augering equipment typically consists of fixed leads in a tower, with permanent strut connections to a crawler crane body. This arrangement would significantly reduce the risk of adversely affecting Huntington Avenue or the adjacent CalTrain mainlines in the event of an accident.

This method has been successfully used, with some variations such as tiebacks, on other jobs in the Bay Area, as well as on the Los Angeles Metro Red Line and the Boston Central Artery/Tunnel projects. This method has become popular with contractors in recent years, where conditions are appropriate, since costs are significantly less than slurry walls and are similar to soldier piles and lagging (which usually requires more extensive dewatering).

The design-build contractor would make the selection of the method to be used and would submit the detailed construction designs and plans to BART, and in turn to CalTrain and any other affected agencies and communities, for approval before any work commences.

- 9.17 Page 2-18 - Operating Characteristics: How long will it take a BART train to go from the Tanforan station into SFIA, reach the airport station, reverse direction, exit the airport station, rejoin the mainline and arrive at the Millbrae station? How long would the direct trip from Tanforan station to the Millbrae station take?

Response. The route miles and estimated travel times for the Aerial Design Option LPA are shown in Table ES-1 and Table 2-1 of this FEIR/FEIS, respectively. These travel times include a 20-second dwell time for passenger loading and unloading at all stations except the Airport International Terminal Station, where the dwell time would be approximately 40 seconds to accommodate baggage handling.

Weekdays and Saturdays (except nights), the BART shuttle train service would operate on approximately 15-minute service and be scheduled to coordinate with CalTrain northbound arrivals and southbound departures. With a four-minute, five-second run time between the Millbrae and Airport International Terminal Stations, there is sufficient time for the BART train operator to reverse directions at either station and maintain a 15-minute headway with one shuttle train.

Late night weekdays and Saturdays, and all day Sunday, BART trains from Millbrae would first be routed into the Airport International Terminal Station and then north towards San Francisco. During these time periods, the stop at the Airport International Station would take approximately 90 seconds. The train operator in the lead car of the train arriving at the station would turn off the train control of that lead car, and another operator at the end of the train would enter the end-car and start up the train for the trip to either San Francisco or Millbrae.

- 9.18 Table 3.1-1: Do the figures presented in this table assume that the CalTrain downtown extension project would be built?

Response. The transit travel times between selected origin and destination pairs do not assume the CalTrain downtown extension project. Travel times assume utilization of the fastest mode (i.e., CalTrain, Muni Metro, bus, or BART). Please refer to Response 6.8 for a discussion of the CalTrain extension to downtown San Francisco.

- 9.19. The SamTrans financial evaluation assumes that passengers boarding and alighting BART (exclusive of the Millbrae-SFO shuttle) in San Mateo County will be charged a surcharge of \$0.60 as well as the normal distance-based BART fare. Were these assumptions used in the patronage modeling used to estimate ridership on the BART extension? These assumptions will have a significant impact on ridership and transfers and need to be clearly stated.

Response. Decisions on fares, including surcharges, would be made by SamTrans in conjunction with BART. The MTC patronage model assumed that the fare on BART or on CalTrain to and from San Francisco would be equivalent. At the time the patronage modeling was performed, the fares were assumed to be equivalent between BART and CalTrain in order to measure the impacts to transit patronage of other project features, such as travel time and frequency of service. When the modeling was performed for the AA/DEIS/DEIR, the patronage forecasts for both the BART-SFIA Extension and the CalTrain Downtown Extension were being analyzed and the future fare assumptions for both

projects were uncertain. Using equivalent fares was considered the most appropriate method of analysis. If the transfer from CalTrain to BART results in fares that are higher than staying on CalTrain for the trip to San Francisco, then a decrease in transfers between the two systems would likely occur and additional CalTrain riders would remain on CalTrain for the trip to San Francisco. Transit fares for trips entirely on BART or on CalTrain without transfers between the two were assumed to be the same as for the existing fare structure, in which fares are based on distance traveled.

Per proposed amendments to the BART SanTrans Comprehensive Agreement, a fare surcharge may be imposed at the San Mateo County BART stations by mutual agreement between BART and SanTrans. A surcharge could slightly decrease the patronage as compared to estimates contained in the DEIR/SDEIS. Considering the current and planned fare increases on BART plus a slight increase in the current surcharge, to reflect inflation, the patronage at the BART-SFIA Extension stations could decrease by as much as eight percent of the patronage estimates made for the proposed project in 2010. Even with this decrease in patronage under the proposed project, the ridership forecast is still greater than projected under the 1992 LPA in the same year. Therefore, imposition of a surcharge is not expected to significantly affect patronage estimates contained in the DEIR/SDEIS.

- 9.20. If the levels of ridership on CalTrain are significantly different north and south of Millbrae due to CalTrain/BART transfers, they need to be specifically identified so that the impacts on CalTrain capacity and patronage revenue are known.

Response. The ridership on CalTrain would be significantly reduced north of Millbrae Avenue because of the transfers to and from BART. For example, according to the MTC travel demand model, approximately 3,500 CalTrain riders would travel northbound on CalTrain at the Millbrae Avenue Station during the A.M. peak hour. After the Millbrae Avenue Station, the number of CalTrain riders would decrease to about 750. The MTC model assumed that riders would always take the fastest transit path to their destination, and the CalTrain to BART transfer for trips to the San Francisco Financial District is the fastest transit path.

Changes in the assumptions used to project patronage, including train frequencies, fare levels, and other transit characteristics, are all elements that could affect the number of BART-CalTrain transfers. To the extent that these characteristics differ from the assumptions used in the study, the number of transfers between CalTrain and BART would change. Please refer to Response 9.19 for further discussion of the effect of fare assumptions on these transfers.

- 9.21. Table 3.1-3: Do the figures in this table assume the Downtown CalTrain extension?

Response. The two tables in the FRDEIR/S#2DEIS that include patronage with the proposed CalTrain downtown extension are Table 3.1-2, Daily Transit Operator Boardings, and Table 3.1-7, Daily Intermodal Transfers Between Rail Services in the FRDEIR/S#2DEIS. The other tables in Chapter 3.1, as well as in Chapter 6, of the FRDEIR/S#2DEIS are based on the CalTrain San Francisco terminus at Fourth and Townsend Streets and do not take into account the potential effects of the proposed CalTrain downtown extension.

- 9.22. Table 3.1-4: Do the figures in this table assume the Downtown CalTrain extension?

Response. Please refer to Response 9.21 for a discussion of assumptions in the referenced table.

- 9.23. Table 3.1.6: Do the figures in this table assume the CalTrain Downtown extension? Would the number of transfers per transit person trip be lower with the CalTrain downtown extension?

Response. Please refer to Response 9.21. The number of transfers between BART and CalTrain would decrease with the CalTrain downtown extension, as indicated in Table 3.1-7 of the FRDEIR/S#2DEIS. Even though the reduction in transfers consists of more than 10,000 transfers, the

impact of decreasing transfers per transit person trip would be relatively minor because the number of total transit boardings would be much larger, at over two million in the year 2010.

- 9.24. Table 6-6: Do the figures in this table assume the CalTrain downtown extension?

Response. Please refer to Response 9.21 for a discussion of assumptions in the referenced table.

- 9.25. Did the environmental analysis include an analysis of parking and traffic impacts of additional CalTrain passengers who would transfer to BART at the Millbrae station?

Response. The transfers between CalTrain and BART would not result in parking or traffic impacts at the Millbrae Avenue Station. The parking and traffic impacts at the CalTrain stations south of the City of Millbrae were not analyzed in the DEIR/SDEIS. CalTrain boardings compared to the No Build Alternative increase by 8,900 riders under the Aerial Design Option in 2010 and by 11,700 under the TSM Alternative in 2010. The increase in boardings on CalTrain compared to the No Build Alternative is based on the increase in CalTrain service from 60 trains per day to 86 trains per day. Evidence suggests that the increase in auto access to CalTrain stations strictly due to the BART-CalTrain intermodal connection would be relatively minor at any one CalTrain station.

10. PENINSULA CORRIDOR JOINT POWERS BOARD–CAC

- 10.1. The major defect in this plan, either above or below ground, is that it fails (utterly!) to address the SEAMLESS transit requirements of the South Bay residents of San Mateo, Santa Clara Counties and beyond. These transit users are entitled to SEAMLESS public transportation, at the same level, as the residents of San Francisco, Alameda, Marin and Contra Costa Counties (see page 2-18 FRDEIR/S#2DEIS.)

Response. The operating plan for the Aerial Design Option LPA is described on page 2-18 of the FRDEIR/S#2DEIS. Weekdays and Saturdays (except late night), BART would provide a dedicated shuttle train operating between the Millbrae Avenue Station and the new Airport International Terminal. The transfer would be made as seamless as possible by coordinating the BART shuttle service to meet CalTrain arrivals and departures at the Millbrae Avenue Station. Late night weekdays and Saturdays and all day Sunday, the shuttle service would not operate, and the Concord route through San Francisco would provide service from Millbrae to the new Airport International Terminal. This comment references service to counties in the BART District plus Marin County and infers that service to the San Francisco International Airport (SFIA) would be seamless for patrons from those counties accessing SFIA on BART, but not for residents in San Mateo and Santa Clara. Please refer to Response 32.11 for a discussion of CalTrain transfers to BART for access to the SFIA. Please also refer to Response 64.42 for a discussion of extending CalTrain directly into the SFIA.

The Aerial Design Option LPA would satisfy all of the Passenger Service Quality Standards adopted by the BART Board and Airports Commission. The location of the recommended BART airport station would be in front of the west wall at the departure level of the International Terminal. At least 50 percent of passengers arriving on BART would be able to reach the first ticket counter at their selected airline terminal location from the midpoint of the BART platform within a four-to-five minute walk without transfers. Moving sidewalks would be added inside the terminal to the North Terminal (United Airlines), and additional elevators and escalators would be added to facilitate passenger convenience. BART baggage check-in would be provided at both ends of the BART platform, in addition to easy access to the ALRS, one level above the BART station via escalator or elevator. Appropriate architectural treatment and fully integrated graphics and signage to provide a user friendly atmosphere would be incorporated during final design.

The Aerial Design Option LPA would also modify elements of the Millbrae Avenue Station, including locating the BART and CalTrain platforms side-by-side, with transfers either by a cross-platform or by an aerial bridge to maximize BART and CalTrain connectivity.

- 10.2. The time-frame from downtown San Francisco to S.F. International Airport is listed at 44 minutes. What happened to the 21st Century rapid transit concepts? This travel time can be achieved, today 1995, using NON-SEAMLESS surface means, and even faster via SEAMLESS bus transportation from the same downtown vicinity.

Response. Please refer to Response 6.11 for a discussion of CalTrain and BART travel times to San Francisco. The Aerial Design Option LPA would provide direct, seamless trips between downtown San Francisco and the new Airport International Terminal.

The average travel speed is determined by station dwell time, acceleration-deceleration ramping, radii of curves, constant speed distance, distance between stations, and time between trains (headway). When all of these factors are combined, a higher constant speed duration does not necessarily mean a great time differential. The commentor would be correct if travel distances between stations were great, with no intervening stations such as between the SFIA and San Francisco, and the alignment were straight enough to allow high speeds. This service would require a dedicated express track, which is not economically feasible.

- 10.3. This "raid" on ever scarce and dwindling transit funds is unconscionable. If approved and allocated -- will deny future funding for existing operating systems that struggle under imposed financially constrained standards in order to serve other segments of the Bay Area....The planned CalTrain-ALRS SFO Intermodal connection, west of U.S. 101, in the same vicinity, will better serve the traveling public coming from the southern regions of the peninsula.

Response. The commentor's opposition to the BART-San Francisco Airport Extension is noted. One of the purposes of preparing the DEIR/Technical Appendix and the Summary DEIR/SDEIS was to solicit public opinions regarding the merits of the different alternatives. Another purpose was to identify impacts affecting local jurisdictions and the SFIA. Public input regarding the merits of the various alternatives is greatly appreciated and was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA). It should be understood that the selection of the Aerial Design Option of Alternative VI as the LPA does not preclude improvements to CalTrain service and its possible extension to a downtown San Francisco terminus. The Metropolitan Transportation Commission's Resolution No. 1876, which identifies the Bay Area's rail transit priorities, includes the BART extension to the airport, the Tasman light rail project in San Jose, and the CalTrain extension to downtown San Francisco. The proposed funding agreement between BART and SamTrans is calculated to ensure that SamTrans can meet its commitments to bus service, to paratransit bus service for the mobility impaired, and to CalTrain service.

11. SAN BRUNO PARK SCHOOL DISTRICT

- 11.1. The San Bruno Park School District opposes all temporary storage yard and staging area alternatives areas located in the vicinity of Belle Air Elementary School, specifically Yard Alternatives A, B, and C as shown on Figure 3.13-3. Such locations would increase the potential dangers to Belle Air students because of the proximity of equipment such as dozers, graders, trucks, cranes, compressors, and concrete pumps; would increase the probability of accidental injuries because of the number of truck trips through the area; would have serious negative impacts on classroom instruction because of the resulting noise, dust, and dirt; and would inhibit student pickup and delivery in a timely manner because of increased traffic....If these locations are determined to be consequences with unavoidable adverse impacts, the San Bruno Park School District takes the following positions: 1.1. Least offensive preference is Alternative C as shown on Figure 3.13-3, provided the Caltrans San Bruno

Avenue collection/distribution artery to Highway 101 South is secured as a segment of the haul route, thus channeling traffic around the perimeter of Belle Air School property instead of through the Avenues. 1.2. Failing attainment of the stipulations in 1.1. above, the District's least offensive preference is Alternative B as shown on Figure 3.13-3, again provided the Caltrans San Bruno Avenue collection/distribution artery to Highway 101 South is secured as a segment of the haul route, thus channeling traffic around the perimeter of Belle Air School property instead of through the avenues.

Response. Construction-related air quality impacts are discussed in Section 3.13.13 of the DEIR/Technical Appendix and in Section 3.13 of the FRDEIR/S#2DEIS. Particulate matter (PM₁₀) impacts are evaluated on the basis of total construction-related PM₁₀ emissions over the entire project corridor, assuming that the entire project corridor is disturbed throughout the entire duration of construction. Numerical significance thresholds for total construction-related PM₁₀ emissions were developed from Bay Area Air Quality Management District (BAAQMD) guidance and are identified in Table 3.10-4 of the DEIR/Technical Appendix. Construction-related PM₁₀ emissions would be minimized through the implementation of Mitigation Measures 1.1 through 1.6, described on pages 3.13-198 through 3.13-200 of the DEIR/Technical Appendix, but would still exceed the numerical significance thresholds. Exceedance of the numerical PM₁₀ emissions thresholds is due to the (assumed) large area of disturbed soil, rather than the intensity of the PM₁₀ emissions. For this reason, construction-related PM₁₀ emissions would not necessarily result in airborne PM₁₀ concentrations in exceedances of the state or federal PM₁₀ ambient air quality standards at any location in the project corridor. Exceedances of the PM₁₀ standards at a particular location in the corridor, such as the Belle Air Elementary School, are unlikely.

Regarding noise, BART will impose construction noise limits on contractors. The DEIR/Technical Appendix (refer to Tables 3.13-11 through 3.13-14) sets forth these noise limits, which are consistent with the local noise ordinances for construction noise. Where construction and/or storage yards are close to noise-sensitive receptors, such as schools, temporary noise walls may be needed to achieve the off-site noise limits. Where schools have special concerns regarding construction noise, BART will explore the possibility with the school district of establishing special zones which might place more restrictive limits on noise.

Please refer to Response 11.3 for a discussion of the 1st Avenue haul route and alternatives to its use. Permitting and access constraints and coordination efforts with local jurisdictions will determine the choice of the laydown area in San Bruno near the Belle Air neighborhood (see Responses 8.31 and 8.32). Please also refer to Response 11.9 for a discussion of access and safety instruction during construction of the proposed project.

- 11.2. Yard Alternative A would make Lion's Field Park unavailable for the children's after school recreational activities.

Response. If Alternative A were selected, BART would erect a temporary sound wall around the construction laydown area as mitigation to reduce noise from truck traffic and to screen views of equipment and materials from park users. BART would also require contractors to regularly water the laydown area, when necessary, to control dust. With these mitigation measures in place, the park would still be available for children's after-school recreation activities, as currently scheduled, in the afternoons and evenings.

- 11.3. The San Bruno Park School District opposes all haul routes anywhere in the vicinity of Belle Air Elementary School or the Avenues. Such routes would increase the probability of accidental injuries because of the number of truck trips through the area; would have serious negative impacts on instruction because of the resulting noise, dust, and dirt; and would inhibit student pickup and delivery in a timely manner because of increased traffic.[.] The District vigorously advocates use of the Caltrans San Bruno Avenue collection/distribution artery to Highway 101 South as a segment of any designated haul routes, thus channeling traffic around Belle Air School instead of through the Avenues.

Response. The actual truck route within the City of San Bruno will be determined by BART in consultation with the City of San Bruno. The route described in the FRDEIR/S#2DEIS was a best estimate of possible routes. One truck route would travel north on 1st Avenue and then northeast on San Mateo Avenue to Highway 101. As described on pages 3.13-36 and 3.13-37 of the FRDEIR/S#2DEIS, a possible mitigation for the noise impacts associated with this route is to have this route parallel to 1st Avenue within the BART construction right-of-way until reaching San Mateo Avenue. Again, this truck route is but one of the possibilities that include direct access from Highway 101 onto the SFIA property. The trucks would travel on Huntington Avenue between San Mateo and Angus Avenue during construction of a cut-and-cover subway box adjacent to this portion of Huntington Avenue under Alternative VI and the Alternative VI Aerial Design Option. In addition, BART, in cooperation with Caltrans, is seeking to implement a truck haul route exiting plan that allows construction trucks to access Highway 101 ramps via temporary roads with minimal need to travel through the City of San Bruno streets. BART would apply for permits to gain direct access between the laydown area in the vicinity of the Belle Air School and Highway 101 for such a truck haul route before seeking permits to use the 1st Avenue haul route. This route would only be effective to gain direct access to Highway 101 for the duration of construction of the proposed BART–San Francisco Airport Extension project.

Emissions of respirable PM₁₀ from soils-hauling trucks would be minimized through the use of “best construction practices,” which include: 1) allowance for 2 vertical feet of freeboard in, and cover of, all trucks hauling dirt, sand, soil, or other loose material; 2) use of wash trucks or wheel washers where vehicles exit unpaved areas onto paved roads; and 3) daily sweeping of streets where visible soil/dust material is carried onto adjacent public paved roads. The use of these implementation measures would reduce PM₁₀ emissions along truck routes to insignificant levels. The majority of construction-related PM₁₀ emissions would occur at the construction sites. Permitting and access constraints will determine the choice of the laydown area in San Bruno near the Belle Air neighborhood. Please refer to Response 11.1 for discussion of construction-related noise impacts. Please refer to Response 8.31 for a general discussion of the alternative laydown areas, and their potential effects on the Belle Air Elementary School.

- 11.4. The San Bruno Park School District requests that BART acknowledge that the building identified as the Armory and located directly west of Belle Air School is no longer vacant but is being used as an official government Post Office, thus increasing traffic in the proposed laydown vicinity and further emphasizing that the street between Belle Air School and said Post Office must not be part of a designated haul route.

Response. BART acknowledges that the building near the Belle Air Elementary School identified as the Armory is being used as an official government Post Office. This building can be accessed from both 2nd and 3rd Avenues in San Bruno, while 1st Avenue provides a secondary access. Please refer to Response 11.3 for a discussion of the 1st Avenue haul route and alternatives to its use.

- 11.5. The San Bruno Park School District requests that BART acknowledge that when the street between Belle Air School and the Post Office located in the former Armory turns west, it narrows to safely accommodate only one vehicle at a time and is part of regular SamTrans service, even further emphasizing why it must not be part of a designated haul route.

Response. Construction activities related to the BART–San Francisco Airport Extension in the vicinity of the Belle Air Elementary School would not use the one-lane east-west road between the Belle Air School and the former Armory. However, the southerly extension of 1st Avenue to the west of the former Armory that is currently a one lane road would be widened to accommodate two way traffic, including construction-related activity under the Alternative VI LPA and the Aerial Design Option LPA.

- 11.6. The San Bruno Park School District opposes a Traction Power Substation at the CalTrain Substation located west of Belle Air School. If a Traction Power Substation is determined to be a consequence with unavoidable adverse impacts, the San Bruno Park School District requests that it be located as far south as feasible, given construction requirements and limitations.

Response. BART will consider this request to locate the substation, as far south as is feasible, during the preliminary engineering phase.

- 11.7. The San Bruno Park School District requests that the contractor use drilled pilings as opposed to driven pilings to minimize the amount of noise that will interrupt the educational process at Belle Air School.

Response. Please refer to Response 8.28 for a discussion of pre-drilling piles. Construction using piles would require special attention where there are nearby sensitive receptors. Pre-drilling piles is a means of reducing noise and vibration impacts. The determination of the construction method used would be made during the final engineering phase of the project.

- 11.8. The San Bruno Park School District opposes storage and/or use of any petroleum products, flammables, compressed gases, explosives, corrosives, solvents, paints, or other similar products in any proximity to Belle Air School. If such storage or use is determined to be a consequence with unavoidable adverse impacts, the San Bruno Park School District requests that storage of use be located at the furthest possible extremes from the district's playgrounds or buildings.

Response. Mitigation measures for the storage of hazardous materials used for equipment maintenance at the proposed contractor staging area near Belle Air School are discussed on page 3.13-209 of the DEIR/Technical Appendix. Suitable hazardous materials storage containers would be used at the alternative construction yard selected, and the proximity to Belle Air School playgrounds and buildings will be used as siting criteria for the selected alternative yard and the hazardous materials storage area.

- 11.9. The San Bruno Park School District insists that BART acknowledge the importance of children and their education and, providing Belle Air School cannot properly function during the BART construction process, commit to funding its relocation to an adequate site.

Response. BART/SamTrans are committed to assisting local governments, community organizations, and schools to maintain quality community and educational services. To this end, BART's good neighbor policy provides community out-reach services, such as school safety instruction programs, and access and safety instruction for the disabled. Such programs are conducted through the BART Community Relations, Safety, and Police Departments. Additionally, BART will work with school and community officials to maintain and coordinate access to and from schools during construction of the proposed project.

BART is prohibited from providing funding to schools for relocation. However, BART/SamTrans would address demonstrable loss of income to the school district, in accordance with federal and state laws that apply to non-profit organizations and public agencies.

BART and SamTrans acknowledge the importance of children and their education and have devoted considerable time and energy to maintaining uninterrupted education while undertaking this major construction project. Please refer to Response 6.40 for a discussion of school revenues.

- 11.10. All of the comments filed in response to the Draft Environment Impact Report/Supplemental Draft Environmental Impact Statement, January, 1995, BART-San Francisco Airport Extension, copy attached, remain in full force and effect. All proposed alternatives for the BART extension south beyond Colma, including the San Francisco International Airport component, have serious

ramifications for hundreds of San Bruno Park School District students living in and/or attending school in the impacted area.

Response. BART and SamTrans recognize the construction-related impacts of the project on area school children. Please refer to Responses to Comment Letter 22 in Chapter 3, Volume II of this FEIR/FEIS for Responses to the concerns raised earlier by the San Bruno Park School District.

12. SAN FRANCISCO INTERNATIONAL AIRPORT

- 12.1. P.ES-2, Second Paragraph: The FRDEIR identifies and analyzes two aerial alignments for the BART airport station (Options B and X). On September 19, 1995, the Airports Commission accepted a variant of Option X as an appropriate BART airport station location, and designated the Option X Variant as Concourse H. For factual completeness and accuracy please include this information in the FRDEIR and clarify whether the Option X Variant would alter the environmental analysis in the FRDEIR.

Response. It has been determined that the Option X Variant, referred to by the airport as Concourse H, would have no further environmental impacts that have not been previously identified in the FRDEIR/S#2DEIS. There are some circulation-related enhancements required within the new International Terminal and north connector building and a slightly different alignment of the Airport Light Rail System (ALRS), all of which have no significant effect on the Airport's Master Plan projects.

- 12.2. P.ES-10, Table ES-2, Fn. 1: Daily BART patronage in San Mateo County for Alternative VI has been revised from 88,300 to 91,000. Please explain the basis for the revision.

Response. Table B-40, Alternative VI, BART Station Entries and Exits, Daily Volumes by Access Mode and Trip Purpose in Appendix B of the BART-San Francisco Airport Extension DEIR/Technical Appendix contained typographical errors under the auto access category. These incorrect numbers were not used in the analysis of traffic impacts that relied on output for the subarea model. However, Table B-40 information was used to construct several other summary tables that incorrectly reported the information on auto access under Alternative VI. Again, the incorrect information reported in Table B-40 did not affect any of the results of the traffic analysis but it resulted in providing incorrect patronage estimates under Alternative VI. Table B-40 has been revised and is included on the following pages.

- 12.3. P.1-3, First Paragraph in Sec. 1.2: The second sentence is misleading in that it suggests that actions by the Airports Commission prompted consideration of additional alternatives after release of the DEIR/SDEIS. For clarification, please revise the text to read as follows: "Consideration of aerial options for bringing BART service into SFIA was prompted by recent actions of the U.S. Congress and BART related to project costs. SFIA's interest in minimizing impact and disruption in implementing the on-going SFIA Master Plan was considered by BART in developing the aerial options. The SFIA Master Plan outlines..."

Response. Text on page 1-3 of the FRDEIR/S#2DEIS, paragraph one under Section 1.2, sentence two is revised to clarify the information as follows:

Consideration of ~~these aerial options for bringing BART service into SFIA~~ was prompted by recent actions of the U.S. Congress ~~and BART related to project costs. BART and the San Francisco Airports Commission related to the project costs and implementation of the SFIA's interest in minimizing impact and disruption in implementing the on-going~~ 1989 San Francisco International Airport Final Draft Master Plan (referred to in this document as the SFIA Master Plan) ~~was considered by BART in developing the aerial options.~~

Table B-40
Alternative VI - Millbrae Avenue via Airport International Terminal
BART Station Entries and Exits (1)
Daily Volumes by Access Mode and Trip Purpose

	1993 (Base Year)		1998 (Year of Opening)		2010 (Horizon Year)	
	Productions	Attractions	Productions	Attractions	Productions	Attractions
Daly City BART Station						
Home-Based Work						
Walk	936	180	985	195	1,029	213
Auto	4,761	—	5,007	—	5,232	—
Transit	2,096	584	2,204	634	2,303	693
TOTAL	7,793	764	8,196	829	8,564	906
Non-Work						
Walk	444	113	467	123	488	134
Auto	980	—	1,031	—	1,077	—
Transit	980	534	1,031	580	1,077	634
TOTAL	2,404	647	2,528	703	2,642	768
Air Passengers						
Walk	13	13	15	15	19	19
Auto	68	68	80	80	99	99
Transit	75	75	87	87	108	108
TOTAL	156	156	183	183	226	226
TOTAL						
Walk	1,394	306	1,467	333	1,536	366
Auto	5,810	68	6,118	80	6,408	99
Transit	3,150	1,193	3,322	1,302	3,488	1,435
TOTAL	10,353	1,567	10,907	1,715	11,432	1,900

	1993 (Base Year)		1998 (Year of Opening)		2010 (Horizon Year)	
	Productions	Attractions	Productions	Attractions	Productions	Attractions
Colma BART Station						
Home-Based Work						
Walk	1,084	196	1,140	212	1,191	232
Auto	5,170	—	5,437	—	5,681	—
Transit	5,328	455	5,603	494	5,855	540
TOTAL	11,582	651	12,180	706	12,727	772
Non-Work						
Walk	376	93	395	101	413	110
Auto	748	—	787	—	822	—
Transit	748	441	787	479	822	523
TOTAL	1,872	534	1,969	579	2,057	633
Air Passengers						
Walk	—	—	—	—	—	—
Auto	—	—	—	—	—	—
Transit	6	6	6	6	8	8
TOTAL	6	6	6	6	8	8
TOTAL						
Walk	1,460	288	1,535	313	1,604	342
Auto	5,918	—	6,223	—	6,503	—
Transit	6,082	902	6,396	979	6,685	1,071
TOTAL	13,459	1,190	14,155	1,292	14,792	1,413

Source: MTC, BART-SFO AA/DEIR Patronage Forecasts, May 1991
MTC, BART-SFO SDEIS/DEIR Patronage Forecasts, October 1993
Parsons Brinckerhoff, December 1993

- (1) "Production and Attraction" format used. Productions are those trips where the station is at the home end of the trip. Attractions are those trips where the station is at the destination end of the trip.

Table B-40 (cont'd)
Alternative VI - Millbrae Avenue via Airport International Terminal
BART Station Entries and Exits (1)
Daily Volumes by Access Mode and Trip Purpose

	1993 (Base Year)		1998 (Year of Opening)		2010 (Horizon Year)	
	Productions	Attractions	Productions	Attractions	Productions	Attractions
Hickey BART Station						
Home-Based Work						
Walk	1,660	126	1,746	137	1,824	150
Auto	2,878	—	3,027	—	3,163	—
Transit	301	489	317	531	331	580
TOTAL	4,839	615	5,089	668	5,318	730
Non-Work						
Walk	527	195	554	211	579	231
Auto	348	—	366	—	382	—
Transit	349	268	367	291	383	318
TOTAL	1,223	463	1,286	502	1,344	549
Air Passengers						
Walk	—	—	—	—	—	—
Auto	—	—	—	—	—	—
Transit	8	8	10	10	12	12
TOTAL	8	8	10	10	12	12
TOTAL						
Walk	2,187	321	2,300	349	2,403	381
Auto	3,226	—	3,393	—	3,545	—
Transit	658	765	693	831	726	910
TOTAL	6,071	1,086	6,385	1,180	6,674	1,291
	1993 (Base Year)		1998 (Year of Opening)		2010 (Horizon Year)	
	Productions	Attractions	Productions	Attractions	Productions	Attractions
Tanforan BART Station						
Home-Based Work						
Walk	72	375	76	407	79	445
Auto	1,980	—	2,082	—	2,176	—
Transit	151	4,348	159	4,720	166	5,158
TOTAL	2,203	4,723	2,317	5,127	2,421	5,603
Non-Work						
Walk	66	385	69	418	72	457
Auto	302	—	318	—	332	—
Transit	302	494	318	536	332	586
TOTAL	670	879	704	954	736	1,043
Air Passengers						
Walk	—	—	—	—	—	—
Auto	—	—	—	—	—	—
Transit	4	4	5	5	6	6
TOTAL	4	4	5	5	6	6
TOTAL						
Walk	137	760	145	825	151	902
Auto	2,282	—	2,400	—	2,508	—
Transit	457	4,846	481	5,261	504	5,750
TOTAL	2,877	5,607	3,026	6,086	3,163	6,652

Source: MTC, BART-SFO AA/DEIR Patronage Forecasts, May 1991
MTC, BART-SFO SDEIS/DEIR Patronage Forecasts, October 1993
Parsons Brinckerhoff, December 1993

(1) "Production and Attraction" format used. Productions are those trips where the station is at the home end of the trip. Attractions are those trips where the station is at the destination end of the trip.

Table B-40 (cont'd)
Alternative VI - Millbrae Avenue via Airport International Terminal
BART Station Entries and Exits (1)
Daily Volumes by Access Mode and Trip Purpose

	1993 (Base Year)		1998 (Year of Opening)		2010 (Horizon Year)	
	Productions	Attractions	Productions	Attractions	Productions	Attractions
Airport International Terminal BART Station						
Home-Based Work						
Walk	—	1,517	—	1,646	—	1,799
Auto	—	—	—	—	—	—
Transit	28	2,194	30	2,382	31	2,603
TOTAL	28	3,711	30	4,028	31	4,402
Non-Work						
Walk	—	1,086	—	1,179	—	1,288
Auto	—	—	—	—	—	—
Transit	196	1,572	206	1,706	215	1,865
TOTAL	196	2,658	206	2,885	215	3,153
Air Passengers						
Walk	3,004	3,004	3,527	3,527	4,354	4,354
Auto	—	—	—	—	—	—
Transit	756	756	888	888	1,096	1,096
TOTAL	3,761	3,761	4,415	4,415	5,450	5,450
TOTAL						
Walk	3,004	5,607	3,527	6,351	4,354	7,441
Auto	—	—	—	—	—	—
Transit	980	4,523	1,123	4,976	1,342	5,564
TOTAL	3,984	10,129	4,650	11,327	5,696	13,005
	1993 (Base Year)		1998 (Year of Opening)		2010 (Horizon Year)	
	Productions	Attractions	Productions	Attractions	Productions	Attractions
Millbrae Avenue BART Station						
Home-Based Work						
Walk	44	941	46	1,021	48	1,116
Auto	4,993	—	5,251	—	5,487	—
Transit	10,065	4,212	10,584	4,572	11,060	4,997
TOTAL	15,101	5,153	15,881	5,593	16,595	6,113
Non-Work						
Walk	73	179	77	194	80	212
Auto	1,320	—	1,388	—	1,450	—
Transit	4,176	1,113	4,392	1,208	4,589	1,320
TOTAL	5,568	1,291	5,856	1,402	6,119	1,532
Air Passengers						
Walk	—	—	—	—	—	—
Auto	—	—	—	—	—	—
Transit	1,044	1,044	1,226	1,226	1,513	1,513
TOTAL	1,044	1,044	1,226	1,226	1,513	1,513
TOTAL						
Walk	116	1,120	122	1,215	128	1,328
Auto	6,313	—	6,639	—	6,937	—
Transit	15,285	6,369	16,202	7,006	17,162	7,830
TOTAL	21,714	7,489	22,963	8,221	24,227	9,158

Source: MTC, BART-SFO AA/DEIR Patronage Forecasts, May 1991
MTC, BART-SFO SDEIS/DEIR Patronage Forecasts, October 1993
Parsons Brinckerhoff, December 1993

- (1) "Production and Attraction" format used. Productions are those trips where the station is at the home end of the trip. Attractions are those trips where the station is at the destination end of the trip.

- 12.4 P.2-1, Third Paragraph: The BART station platform for Option X is described as being located one floor above the departure level in the planned International Terminal. This description is inaccurate since the BART platform for this Option will be located on the same level as the departures level. Please revise the FRDEIR.

Response. Text on page 2-1 of the FRDEIR/S#2DEIS, Section 2.1, third paragraph is revised to correct this error as follows:

Both Options B and X include passenger convenience features that are consistent with BART and San Francisco Airports Commission resolutions adopting BART Passenger Service Quality Standards. ~~Both options~~ Option B provides key features which ~~Option X does not~~ acceptable walking timeframes to and from the International Terminal, the Terminal Complex, and a convenient connection between BART and the ALRS. ~~However, Option X provides minimal facility level changes, because the station platform is one floor above the departure level in the planned International Terminal.~~

The BART platforms are located on the same level as the departures level of the International Terminal.

- 12.5. P.2-13, Fourth Full Paragraph: The FRDEIR identifies two optional locations for the traction power substation and train control bungalow at the Airport Station: (1) underneath the aerial alignment near the Airport International Terminal Station; or (2) at-grade and immediately east of Highway 101 under the aerial alignment. BART should consider the Airport's proposed pedestrian walkway between the parking structure and the International Terminal as a potential location for the traction power substation location.

Response. BART is working directly with San Francisco International Airport (SFIA) staff and their consultants to finalize the location of the traction power substation and train control facilities required at the SFA east of Highway 101. The current direction is to locate the train control facilities directly under the west end of the BART platform, and the traction power substation and associated gap breaker bungalow just east of Highway 101 on the west end of Parking Lot C, as generally shown in the document.

- 12.6. P.2-18, Fourth Paragraph: Please explain the basis for determining ridership demand and headways to the Airport since air passenger peak hours are different from commuter peak hours.

Response. Ridership demand is based on Metropolitan Transportation Commission's (MTC) patronage forecasting model, while air passenger ridership was estimated with the use of a special airport model produced by a subconsultant to MTC for the AA/DEIS/DEIR. These models provide 24-hour ridership estimates. Peak-hour estimates were developed from the 24-hour data by applying peak factors supplied by MTC and documented on pages 13 through 16 of the Transportation Technical Report that was part of the Summary DEIR/SDEIS. Headways between BART trains were developed independently from the ridership estimates. They are based on operating requirements, opportunities, and constraints of the BART system and used for planning purposes. While these BART headways are not specifically based on ridership demand, study results indicated that BART service will be sufficient to handle predicted ridership, i.e., no overcrowding on BART trains would occur. BART headways are assumptions used for the environmental documents and BART would have the opportunity, particularly during the off-peak hours, to increase service if actual ridership warrants.

- 12.7. P.3.1-1, Last Paragraph: The FRDEIR examines the impacts of the BART extension with the CalTrain downtown extension for the Alternative VI aerial options, based on the analysis in the 1992 AA/DEIS/DEIR. More current data has not been included in this FRDEIR. The CalTrain San Francisco Downtown Extension Project Design Option Screening Report uses the MTC Model and

San Mateo Forecasting Model to forecast 2010 figures based on 1994 data. This data is more current than the CalTrain ridership data contained in the AA/DEIS/DEIR.

Response. The assumptions used in the travel demand modeling, such as forecasts of future households and jobs, remained consistent from the AA/DEIS/DEIR to the DEIR/SDEIS and the FRDEIR/S#2DEIS so that the transit patronage forecasts for the various alternatives studied could be compared among one another. Please refer to Response 6.25 for a discussion of modeling and the need to maintain consistent modeling assumptions

- 12.8. The impacts of a CalTrain downtown extension on BART ridership have not been provided for Alternative IV and V. Under CEQA and NEPA, the FRDEIR should provide this information.

Response. The FRDEIR/S#2DEIS was prepared primarily to evaluate the Alternative VI Aerial Design Option. The commentor's concern deals with Alternatives IV and V. Additional information on the CalTrain downtown extension can, however, be found in Response 6.8.

- 12.9. P.3.1-16, 5th & 6th Paragraphs: The fifth paragraph states that there would "be a significant reduction in pedestrian volumes at the Airport International Terminal Station under the Aerial Design Option compared to Alternative VI." However, the next paragraph appears to contradict this statement by indicating that there would be an increase in pedestrian volumes around the new International Terminal and Millbrae Avenue BART stations. Please clarify and explain the difference in pedestrian volumes between Alternative VI and the Design Options.

Response. The statement in the fifth paragraph describes the difference in pedestrian volumes between Alternative VI and the two Alternative VI design options. The decrease in pedestrian volumes under the two aerial design options compared to Alternative VI occur because BART headways lengthen under the design options compared to Alternative VI, resulting in lower ridership to the SFIA under the design options than under Alternative VI. Pedestrian volumes for Options B and X at these two stations are contained on page 3.1-17 of the FRDEIR/S#2DEIS, whereas pedestrian volumes for Alternative VI are contained in Table 3.1-113, Alternative VI Peak-Hour BART Station Pedestrian Entries and Exits of the DEIR/Technical Appendix.

The statement in the sixth paragraph describes the difference in pedestrian volumes between the No Build Alternative and the two aerial design options. Pedestrian volumes in the vicinity of the Airport International Terminal Station and the Millbrae Avenue Station would increase under either Design Option B or Design Option X in comparison to the No Build Alternative. The text should be modified to clarify the increase in pedestrians. Page 3.1-16 of the FRDEIR/S#2DEIS, sixth paragraph, first sentence is revised as follows:

Under the Alternative VI Aerial Design Option (either Option B or X), pedestrian volumes would increase around the new Airport International Terminal and the Millbrae Avenue BART Stations compared to the No Build Alternative.

- 12.10. P.3.2-1, Fifth Paragraph; P.3.2-2, Second Paragraph; p.3.2-4, Second Paragraph; p.3.13-15, Fourth Paragraph: The FRDEIR indicates that both aerial design options would require easements and fee acquisition of SFIA property. However, the Airport and BART have not conducted any formal discussions concerning BART's acquisition of SFIA property, and other types of arrangements that may be considered. Therefore, for accuracy, please revise the FRDEIR to indicate that easements and fee acquisition of SFIA property "may be required."

Response. The commentor is correct. At this time, no formal discussions have been entered into with SFIA regarding acquisition of SFIA lands. However, BART and the SFIA are developing a Memorandum of Understanding (MOU) which will address real estate and property rights issues

required for the project. The revised Design Appendix (Volume IV of this FEIR/FEIS) contains the correct land use designation for all airport property required for the proposed project.

- 12.11 P.3.7-2, Second Paragraph: The FRDEIR states that the aerial design option would require the placement of fill material in drainage ditches west of the CalTrain tracks. What are the impacts, if any, on storm water flows?

Response. As discussed in Section 3.8 of the FRDEIR/S#2DEIS, placement of fill in drainage ditches would impact some floodplain storage capacity and overland drainage patterns. In order to maintain existing drainage volumes and flows, drainage channels and culverts which are infilled during sound wall and service road construction on the west side of the CalTrain tracks would be relocated and/or extended as part of the Alternative VI Aerial Design Option. In addition, the Section 404 permit from ACOE will require that the wetland areas displaced by Alternative VI Aerial Design Option construction be replaced. Therefore, impacts to stormwater flows would be reduced to an insignificant level.

- 12.12 P.3.7-3, Last Paragraph: It is unclear what the physical relationship of the tide gate at the mouth of Cupid Row Canal is to the proposal to create wetlands in the upland area. Except when flooding occurs, the two areas would not be connected hydrologically. Please clarify the relationship.

Response. When open, the tide gate at Cupid Row Canal allows the intrusion of saltwater into the freshwater marsh. This results in a loss of freshwater marsh vegetation, used as cover by the San Francisco garter snake (SFGS) and SFGS prey species (California red-legged frog) and habitat for these species.

The SFGS is expected to use the created seasonal wetlands when water is present and move to other areas during the rest of the year. Maintenance of the tide gates would enhance the habitat value of Cupid Row Canal for the snake and its prey. Snakes using the seasonal wetlands could forage in the canal year-round and use the seasonal wetlands when water is present.

Upon further consultations with the U.S. Fish and Wildlife Service (USFWS) and the SFIA since the publication of the FRDEIR/S#2DEIS, it has been determined that the mitigation on the west of Bayshore parcel would not consist of creation of wetlands out of upland habitats. Instead, the mitigation measures on the west of Bayshore parcel would involve the enhancement of habitat values of existing wetland habitats, like Cupid Row Canal. For further details on these mitigation measures, please refer to the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS.

- 12.13 Please note that there has been no formal discussions with SFIA concerning the creation of additional wetlands on its west of Bayshore parcel. Any proposal for mitigating the project impacts on the Airport's west of Bayshore parcel cannot reduce the utility of the Airport's use of that property, consistent with the Commission's authority and responsibility to wisely manage Airport property and to ensure the ability to develop facilities to meet future needs.

Response. BART is aware that its use of the airport's land is limited by the degree to which such use interferes with the SFIA's proposed uses. A mitigation program acceptable to the USFWS has been successfully developed and agreed to by the SFIA in concept. BART is now working with the SFIA to finalize these agreements as necessary. The reader should refer to the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS for details on this program.

- 12.14 P.3.7-4, Paragraph 1.2; P.3.7-5, Paragraph 2.1: The management task relating to the repair and proper maintenance of the tidal gate to Cupid Row Canal is already being implemented. The tide gates are operational and properly maintained. Tules are hand cleared from the channel by the Conservation Corps each year. The intrusion of salt water is caused by the failure to shut the tide gates.

Accordingly, the mitigation measure should be amended to provide for BART's monitoring for the closing of the tide gates after storm events.

Response. The following text is added on page 3.7-4, Mitigation Measure 1.2 and on page 3.7-5, Mitigation Measure 2.1 of the FRDEIR/S#2DEIS:

The SFIA and the San Mateo County Flood Control District (SMCFCD) have recently implemented repair and maintenance of the Cupid Row Canal tide gates and the gates are now operational. BART will implement a management program for the tide gates and monitor the enhancement of freshwater habitats along Cupid Row Canal resulting from the tide gate management program. BART will work with the SFIA and USFWS to select the most appropriate management program, designed to enhance freshwater habitats while maintaining flood protection. BART will then implement the 20-year tidal gate program (with cooperation of the SFIA) and will monitor the effects on the wetland habitats for the first five years of the program.

- 12.15. P.3.7-1 et seq.; Pp.3.13-24 - 3.13-36: BART has requested SFIA's conceptual approval of five mitigation measures to address the impacts on the San Francisco garter snake. With the exception of the maintenance of the tidal gate at Cupid Row Canal as a long term mitigation measure (p. 3.7-4), none of the measures identified in BART's request are present in the FRDEIR. Please explain the omission, and please identify which measures, if any, identified in the FRDEIR to address the impacts on the SFGS are no longer under consideration.

Response. As a result of consultations with the USFWS and the SFIA, a mitigation program for impacts to species protected under the Federal Endangered Species Act was developed. BART and the USFWS have successfully negotiated a mitigation program as presented in the Biological Assessment (BA) and Biological Opinion (BO) in Volume V of this FEIR/FEIS. The mitigation program includes the following measures on the west of Bayshore parcel as well as other measures. The reader should refer to the BA and BO for further details:

- 1) Mitigation measures during project construction.
 - Fencing of construction and preconstruction areas to protect the SFGS.
 - Temporary construction of road trestle above wetlands.
 - Biological monitoring program.
- 2) Habitat enhancement measures.
 - Hydrology study of the west of Bayshore parcel.
 - Enhancement of seasonal wetlands at the southern end of the west of Bayshore parcel.
 - Management plan of tidal gates on Cupid Row Canal to enhance SFGS habitat.
 - SFGS capture feeding program during project construction.
 - Development and implementation of a bullfrog abatement program.

- 12.16. P.3.13-31, Last Paragraph: The FRDEIR proposes to mitigate the construction impacts on the San Francisco garter snake by removing them from the site to an approved facility, such as a university, zoo, or other research facility. Please include information in the FRDEIR on the feasibility of this proposed mitigation measure.

Response. Mitigation measures for the SFGS include a captive feeding program only for those SFGS caught while clearing construction areas. The USFWS has indicated that the SFGS does well in captivity, and captive snakes have been reported to give birth to relatively healthy litters (Barry, 1978; McGinnis, 1991). All details regarding mitigation measures for snake populations and habitats are presented in the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS.

- 12.17. P.3.7-7, Last Paragraph: Please include in the FRDEIR a more expanded discussion of the cumulative impacts of the aerial design options on biological resources, including those associated with the construction of the trestle and aerial structures, geotechnical field investigations for the aerial structure foundations, the relocation of the PG&E high voltage transmission lines, the proposed Mojave Pipeline project, as well as impacts that may arise from the repair, maintenance, and/or operation of the aerial structures and their supports on the west of Bayshore property and elsewhere.

Response. The cumulative analysis presented in the FRDEIR/S#2DEIS is adequate. The intent of the analysis is to discuss impacts in general, as a more detailed discussion of impacts would require analysis of projects not related to BART or projects that are not completely designed. BART does not plan to build maintenance roads or maintenance facilities on the west of Bayshore parcel. Maintenance and repairs will be done from the aerial structure. Section 13 of the FRDEIR/S#2DEIS discusses impacts and mitigation measures for construction activities. The contribution of the geotechnical field investigation to cumulative impacts is addressed in Section 3.13 of the FRDEIR/S#2DEIS.

- 12.18. P.3.13-14, First & Second Paragraphs: Alternatives B and C storage yards and staging areas would be accessed by workers using a new, temporary road connecting to the San Bruno Avenue interchange by way of an existing Caltrans road along the westerly side of Highway 101. However, the proposed access road will be in the area under construction as part of the Airport's ramps project. Please address this conflict.

Response. During the preliminary engineering, the decision for location of the access and haul routes to the selected temporary construction storage yard would be made only after detailed review of the designs, schedules, and plans prepared by the SFIA for the construction of the Airport's ramps project. Only then can an informed decision be made with the assurance of avoiding conflicts with that portion of the work to be performed by the SFIA. Coordination of plans and activities between BART, Caltrans, and the SFIA would be necessary on a periodic basis to maintain a coordinated joint operation.

- 12.19. P.3.13-33, Second Paragraph: The amount of wetland disturbed under the trenching alternative for the relocation of the PG&E transmission lines is based on the assumption that the impacted area is no more than 2 feet in width. Please clarify whether the FRDEIR has factored in disturbances caused by the width of the trenching machine, as well as the placement of bedding material and laying cable that will impact the wetlands. The width of the trenching machine itself is several times the two feet width and its passing will impact the wetlands.

Response. Various construction alternatives were considered to relocate the PG&E transmission lines, including trenching and placing the transmission lines underground. Upon further consideration and analysis, the alternative of new and taller tubular towers to raise the transmission lines a safe distance above the BART aerial trackway was selected in consultation with PG&E and the USFWS. The trenching alternative is no longer under consideration. However, for clarification, the impact analysis in the FRDEIR/S#2DEIS did consider disturbances caused by the trenching machines.

- 12.20. P.3.8-1: An analysis of the impacts on storm water drainage resulting from the filling of drainage ditches under the CalTrain tracks (p.3.7-2) has not been included in the FRDEIR. Please provide this analysis.

Response. Please refer to Response 12.11 for a discussion of stormwater drainage and infilled waterways. As discussed on page 3.8-1 of the FRDEIR/S#2DEIS, drainage channels would be relocated and culverts extended in order to maintain existing drainage volumes and flows.

- 12.21. P.3.8-2: During construction, pre-drilling the piles for the BART foundation may allow for surface water to migrate into and below the layer of bay mud at SFIA. Please address this potential impact.

Response. Standard engineering practices would be used to prevent existing contamination in the shallow perched aquifers from permeating to lower beneficial use aquifers in areas where pre-drilling for piles is warranted. The project-specific geotechnical investigation would identify the location and thickness of undesirable fill material along the alignment which must be pre-drilled prior to pile driving. That investigation would also identify the thickness of bay mud layers underlying that fill. In areas where pile pre-drilling is determined necessary to penetrate fill material, pre-drilling would be terminated below fill material and above the bottom elevation of bay mud layers.

- 12.22. P.3-8.2: During wet weather, the BART aerial guideway and platform may collect water unsuitable for discharge into the sanitary sewer system. Please identify the proper measures that would be required to allow for drainage into an industrial waste system.

Response. Runoff from the BART aerial guideway and platform should not generate a significant "first flush" event that would warrant collection and distribution of such runoff into an industrial waste disposal system. However, periodic stormwater discharges from impervious surfaces that are released to navigable waters are regulated by the Clean Water Act and subject to certification or waiver under Section 401 of that statute. A water quality certification from the Regional Water Quality Control Board (RWQCB) will be secured, in conjunction with the 404 permit (the U.S. Army Corps of Engineers has entered into a preliminary agreement with BART to issue a 404 permit).

- 12.23. P.3-9-6: Please evaluate the aerial option's vibration and noise impacts, if any, on the Airport Light Rail System, and the new International Terminal, structures and public areas.

Response. There would be no noise or vibration impacts from BART's aerial option with respect to the Airport Light Rail System. No noise and/or vibration impacts are expected at the new International Terminal, because the BART station would be structurally isolated from the new Terminal building, and trains would be traveling very slowly. The public areas outside the International Terminal are noisy by nature (e.g., jet noise, motor vehicle noise). BART noise would not significantly add to the existing ambient noise, because the trains would be moving very slowly at the station. Typically, the public using the terminal facilities would expect and be accustomed to ambient noise and vibration levels. Designs to provide adequate isolation for extraordinary noise and vibration between the BART facility and the International Terminal would be developed in final engineering with the airport's International Terminal consultant reviewing any proposed designs.

- 12.24. P.3.13-1, Third Paragraph: P.3.13-14, Fourth Paragraph: The FRDEIR states that the Airport will design and construct the portion of the BART extension project located east of the western edge of Highway 101. The text should be revised with the following to provide a more accurate description: "Although no formal agreement has been reached, BART and SFIA contemplate that to the extent legally permitted SFIA will design and construct the portion of the BART project located east of the western edge of Highway 101, including the highway overpasses, the station in the International Terminal, and support structures.

Response. To reflect the detail contained in this comment, the FRDEIR/S#2DEIS, page 3.13-1, third paragraph, second sentence, and page 3.13-14, fourth paragraph, first sentence, are replaced with the following sentence:

Although no formal agreement has been reached, BART and the SFIA contemplate that to the extent legally permitted, the SFIA will design and construct the portion of the BART project east of the western edge of Highway 101, including the highway overpasses, the International Terminal Station, and the support structures.

- 12.25. Use of Airport funds for the portion of the BART project [located east of the western edge of Highway 101] must be consistent with federal grant assurances, Airport bond agreements, and Airline-Airport Use and Lease Agreement.

Response. The use of the SFIA funds committed to the portion of the BART project on airport property will be in accordance with federal grant assurances, airport bond agreements, and Airline-Airport Use and Lease Agreements.

- 12.26. P.3.13-39, Last Paragraph: The FRDEIR states that the cumulative impact of constructing the BART project concurrently with the Airport's ramps project may impact freeway operations. Please include additional information in the FRDEIR on the impact to freeway operations.

Response. The Aerial Design Option LPA would traverse Highway 101 just to the north of the SFIA International Terminal inbound/outbound ramps. In order to construct the foundations, columns, and superstructures over the freeway, both projects (the BART extension and the airport's ramps project) would require narrowing mainline freeway lanes, lane closures, and detours. Concurrent construction would require coordination between the two projects and could potentially lengthen the construction period of either project. Concurrent construction would, however, minimize the overall duration of impacts on freeway operations, compared to non-concurrent construction. Sponsors of the BART extension have proposed that the SFIA construct that portion of the aerial wye alignment that crosses Highway 101. If this proposal is accepted by the SFIA, then the airport would control coordination of the two projects. Please refer to Response 20.21 for further discussion of construction impacts to Highway 101 under the Aerial Design Option.

- 12.27. P.6-1, Last Paragraph; p.6-3, Table 6-3; P.6-6, Second Full Paragraph; P.6-6, Second Full Paragraph; P.6-7, Second Full Paragraph: The FRDEIR states in various places that SFIA has committed \$200 million for the on-Airport costs of Alternative VI. This statement requires clarification...On November 1, 1994, the Airports Commission adopted a resolution providing that it would consider a contribution of up to \$200 million should BART select Alternative VI upon completion of the EIR/EIS process...The FAA confirmed that the use of airport revenue to pay for specific elements of the construction of BART facilities on SFIA would not be an improper diversion of revenue under Title 49 U.S.C. Section 47107(b), subject to certain limitations and conditions. Copies of the above-referenced correspondence had previously been submitted with SFIA's March 10, 1995 comments on the DEIR/SDEIS. Please revise the FRDEIR accordingly and include information on the status of developing funding agreements.

Response. As noted in the text of the environmental documents, the use of airport funds is restricted. All text and tables are based on the understanding that a maximum of \$200 million of airport funds would be committed to the BART extension; \$200 million is less than the total on-airport costs of the project; airport funds would only be applied to eligible on-airport costs; there are restrictions on various airport fund sources; and the SFIA and BART will agree in an Memorandum of Understanding (MOU) to define the funding program for its share of the project.

- 12.28. P.6-2, Table 6-1: The table contains footnotes indicating that the table excludes capital costs to be incurred by the Airport for accommodating BART. These other costs should be captured in a category entitled "Costs Covered By Others."

Response. Since the airport's design costs are a portion of the airport's maximum \$200 million contribution, they are included in the funding plan shown in Tables 6-3, 6-4, and 6-5 of the FRDEIR/S#2SDEIS.

- 12.29. [Table 6-1] indicates that the costs for environmental mitigation for Options B and X would be the same as the costs for Alternative VI (\$9.8 million). Please explain why the more substantial biological resources impacts under the aerial options would not reflect an increase in the environmental costs over Alternative VI.

Response. Please refer to Response 16.7 for a discussion of the conceptual mitigation costs estimated for construction in the sensitive area west of Highway 101.

- 12.30. P.6-3, Table 6-3: This table identifies SFIA as a source for the identified “required uncommitted funds.” Please note the restrictions on the use of Airport revenues.

Response. Please refer to Response 12.27 for a discussion of the use of SFIA’s maximum contribution.

- 12.31. P.6-12, Table 6-7: For accuracy, the Cost Effective Index for Options B and X should include the capitol costs to be incurred by the Airport for accommodating BART. Please indicate FTA’s criteria for the “Cost Effective Index.”

Response. The Cost Effectiveness Index (CEI) does not include capital costs to be incurred by the SFIA. Please refer to Response 6.76 for a discussion of the CEI and Federal Transit Authority (FTA) usage.

13. SAN MATEO COUNTY TRANSPORTATION AUTHORITY

- 13.1. The design for the Millbrae Station does not identify the expected ease of transfer between CalTrain and BART. The drawings show that some patrons will need to utilize the overhead crossing while others will have a cross-platform transfer. Because this is an important transfer point, additional detail should be provided on the share of patrons expected to utilize each transfer path.

Response. Please refer to Response 9.10 for a discussion of transfers at the Millbrae BART/CalTrain Station.

- 13.2. CalTrain and BART utilize different fare collection arrangements, therefore, additional information is needed about the fare collection process so that its impact on transferring patrons can be better understood. Proposed arrangements for CalTrain riders destined for the Airport also need to be identified.

Response. Decisions on fare collection arrangements would be made by agreements between SamTrans, Peninsula Corridor Joint Powers Board (JPB) and BART, and details on fare collection would be developed through continued coordination on the project. CalTrain riders who would transfer to BART for access to the SFIA under Alternative VI or the Aerial Design Option LPA may not be required to pay an additional fare on BART but may receive a transfer from CalTrain facilities. The decision regarding whether or not to have a transfer fare would be made by the JPB and SamTrans in conjunction with BART.

Under all of the BART build alternatives and the TSM Alternative, CalTrain riders traveling to the SFIA would be required to transfer to a transit system at an “off-airport” station.

- 13.3. CalTrain ridership is projected to grow according to Table 3.1-2, however, because of the transfer at Millbrae, CalTrain ridership south of that point is likely to be higher than in the segment north to San Francisco. Additional detail on CalTrain ridership both north and south of Millbrae is needed to adequately assess the impacts on CalTrain service and finances.

Response. Please refer to Response 9.20 for a discussion of CalTrain ridership north and south of Millbrae.

- 13.4. The Authority has joined with the JPB to the potential for a direct Airport Light Rail System connection to CalTrain along the existing CalTrain line. Since the specifics of this potential link remain to be determined, it is not possible to evaluate physical design issues which may arise. The BART final document should, however, identify any elements of the proposed BART project which would not be required if the CalTrain Airport connection were provided by a alternative arrangement.

Response. The possible Airport Light Rail connection to CalTrain is the topic of another study. The San Mateo County Transportation Authority and the Peninsula Corridor Joint Powers Board are cosponsoring the *CalTrain–San Francisco International Airport Light Rail System Connection Feasibility Study*. The study is evaluating the feasibility of connecting the light rail transportation system, currently being designed by the San Francisco Airport, to CalTrain and will be completed in April 1996. The connection of the Airport Light Rail System (ALRS) to CalTrain is an independent feasibility study and is separate from the proposed BART–San Francisco Airport Extension project. The BART extension alternatives are stand-alone alternatives.

The SFIA and BART have been working together to make the BART-to-SFIA project a reality. The Airports Commission will consider the JPB's recommendation at the conclusion of the *CalTrain–San Francisco International Airport Light Rail System Connection Feasibility Study*. Since the results of the potential ALRS connection to CalTrain under study are not known, and since any proposed alternative lacks environmental clearance, identified funding sources, and is not part of Metropolitan Transportation Commission's (MTC) Resolution No. 1876, it is premature to say that it is planned and funded.

In 1994, the JPB requested that the airport proceed with further investigation of the CalTrain/ALRS connection. The airport responded that any further action on the connection issue should be delayed pending the outcome of the BART–San Francisco Airport Extension study.

In 1995, the JPB requested but did not receive financial assistance from the San Francisco Airports Commission for a \$100,000 feasibility study. Airport staff are, however, working with and providing information to the JPB and San Mateo transit agencies to conduct the CalTrain-ALRS feasibility study. The ALRS is also being designed to allow for the extension of the system to serve the airport's west of Bayshore property. However, the San Francisco Airports Commission and the BART and SamTrans Boards of Directors have determined a preferred location for the BART airport station.

In 1995, the JPB also inquired about the Airports Commission's position on and legal commitment to an ALRS connection to CalTrain. Based on this request, the San Francisco City Attorney rendered a legal opinion on the airport's commitments to making an ALRS connection to the west of Bayshore property for a CalTrain station. The legal opinion is summarized below.

Issue. Did the Airports Commission, through its adoption of the Airport Final Mitigation Plan, commit to extending the Airport Light Rail System "(ALRS)" west of Bayshore for a CalTrain Station?

Conclusion. No. The relevant measure in the Final Mitigation Plan provided for an ALRS extension to a combined BART/CalTrain station, and not to a CalTrain only station. Although the Commission is not legally required to extend the ALRS west of Bayshore for a CalTrain station, the Commission has discretion to consider such a proposal, subject to legal requirements.

14. SAN MATEO UNION HIGH SCHOOL DISTRICT

- 14.1. Unless I missed it as I went through the report, I find no mention of problems facing [the San Mateo Union High School District] caused by the extension.

Response. The potential impact on the San Mateo Union High School District was not described in the DEIR/Technical Appendix because the impact was determined not to be significant. Relative to the elementary school districts, the San Mateo Union High School District is much larger, encompassing six conventional high schools, a continuation school, and an adult school, with a total of

9,800 students including adults. Also, since the District includes six cities, the probability of relocation within the District boundaries is quite high.

- 14.2. The district will be financially harmed by the proposed routing due to the removal of assessed value from the property tax roll.

Response. Please refer to Response 6.40 for a discussion of school revenues. Loss of students and/or loss of assessed value may be detrimental to school districts, but proportionately less so to a larger high school district than to the elementary school districts described in the DEIR/Technical Appendix. The San Mateo Union High School District has a total annual budget of approximately \$50 million, of which about 80 percent is based on a district wide assessed value of \$21.4 billion. Any property removed from the tax rolls by the proposed project would be very small relative to this total. Within several years, there is the possibility that BART station-related development would more than offset the loss of assessed value from dislocated activity.

3.4 ORGANIZATIONS

15. AIR TRANSPORT ASSOCIATION, #1

- 15.1. The comments contained in this letter were presented by the author at the public hearing on the FRDEIR/S#2DEIS and are addressed under the speakers section, beginning with Response S32.

16. AIR TRANSPORT ASSOCIATION, #2

- 16.1. ATA member airlines support the extension of BART to SFIA. The airlines believe that the extension of BART will help alleviate motor vehicle congestion and improve passenger and employee accessibility to SFIA.

Response. The commentator's support for the BART–San Francisco Airport Extension is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) at the close of the public review period for Volume II of the FEIR/FEIS. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Volume I of the FEIR/FEIS, which explains why BART is pursuing an aerial alignment into the SFIA.

- 16.2. The viability of the BART-SFIA project is dependent in no small measure on the ability of the project sponsors to identify clearly both the full range of costs that will be incurred and the funding sources available to meet those costs. Unfortunately, the FRDEIR/S#2DEIS does not appear to satisfy these dual goals....The capital cost estimates for Options B and X suffer from underestimated and omitted costs, as well as a failure to identify fully the effects of cost escalation due to the inflation and other factors. Likewise, necessary funding sources appear either to be subject to significant qualifications and limitations or simply not to have been adequately identified. BART must address these financing concerns squarely and forthrightly in order to ensure that this important regional transit objective is brought to a successful conclusion.

Response. Please refer to Response 6.67 for a discussion of the financial plan, and Response 16.3 for a discussion of capital cost estimates provided in an environmental document.

- 16.3. The capital cost estimates contained in the FRDEIR/S#2DEIS may not accurately reflect the full costs of Options B and X, as a result of the underestimation or omission of significant additional costs. In particular, the construction of the aerial wye-stub and BART station at SFIA appears to implicate significant additional cost impacts, including costs to SFIA itself -- costs that will have to be borne by

the BART-SFIA project. Thus, a full accounting of these additional costs must be made so that any necessary adjustments or modifications can occur in a timely fashion.

Response. The capital cost figures shown in the Summary DEIR/SDEIS are, as noted, conceptual cost estimates, as was appropriate before an LPA was selected. Preliminary engineering, which is the basis for more refined cost estimates, is carried out only for the LPA, not for every alternative or design option reviewed in the Summary DEIR/SDEIS.

The conceptual cost estimates provided in the Summary DEIR/SDEIS were defined by developing a unit-cost database, drawing from the experience of the three BART extension projects under construction at the time. This opportunity to rely on current, geographic-specific, contractor-specific cost information for a major public sector construction project is very uncommon, and gives greater certainty to the conceptual costs than would normally be expected prior to selection of a project.

- 16.4. As a result of changes in the commencement schedule for the BART-SFIA project, the cost of purchasing the number of new BART vehicles required for this project appears to have risen significantly. A November 1994 internal BART memorandum indicates that, as a result of project delays, BART will not be able to take advantage of a vehicle purchase option that was to expire in April 1995, resulting in higher vehicle prices. Additionally, the amount previously budgeted for BART vehicles, even when calculated at the original option price, appeared insufficient to purchase the 46 vehicles required by the BART extension. Consequently, the \$104 million budgeted for new BART vehicles in the FRDEIR/S#2DEIS appears to be insufficient to meet project demands. Realistic price and demand considerations indicate that BART likely will require at least another \$50-60 million to purchase the needed vehicles.

Response. The commentor is correct that the vehicle purchase option was not exercised. The amount budgeted for new vehicles is \$104 million. Please also refer to Response 6.75 for a discussion of project financing.

- 16.5. In addition, displacement costs may have been underestimated in the FRDEIR/S#2DEIS capital cost estimates. Federal and state laws require displaced residents and businesses to be relocated and compensated by the project sponsor in accordance with detailed guidelines.

Response. BART has completed successful business and residential relocations associated with other extension projects, and is aware of state and federal regulations. All pertinent regulations will be followed in completing the relocation process.

Federal and state relocation guidelines and procedures require that a Final Relocation Plan (FRP) be performed prior to relocation of residents and businesses. The FRP will document the quantity of required replacement housing needed for the project, as well as the amount of available replacement housing to meet the needs of displaced residents, in accordance with Uniform Relocation Act requirements. This comprehensive report will detail all residential and business impacts. The report will be prepared by BART for inclusion in Volume V, Technical Appendices of this FEIS/FEIR.

The Uniform Relocation Act, passed by the U.S. Congress in 1970, and the State of California relocation assistance laws will be followed in all cases where residences or businesses are required to relocate due to the BART extension.

- 16.6. Because Options B and X involve significant residential and business displacement, displacement costs have the potential to be a significant project cost. Unfortunately, BART's methodology for calculating displacement costs is unclear, and its displacement cost estimates appear questionable. In fact, FTA staff have raised concerns about the understatement of displacement costs on this project. In light of these concerns, BART's displacement cost estimates and methodology for Options B and X should be reviewed carefully.

Response. Please refer to Response 16.5, above for a discussion of BART's Final Relocation Plan (FRP). Residential and business displacement costs are a significant project cost. As a result, these costs are subject to review by the Federal Transportation Administration (FTA), State of California, BART, and SamTrans officials. Both the methodology for determining right-of-way alignments and developing right-of-way cost estimates for the LPA are subject to further review. Additionally, the FRP will provide detailed analysis of all relocation and acquisition impacts and costs. This comprehensive report will detail residential and business impacts.

Estimated costs associated with acquisition and relocation of residences and businesses are included in the right-of-way line item of capital costs shown in Table 6-1 of the Summary DEIR/SDEIS, the DEIR/Technical Appendix, and the FRDEIR/S#2DEIS. BART and SamTrans believe sufficient funds are included in right-of-way costs to cover acquisition and relocation costs for each alternative.

- 16.7. BART also inappropriately has used a consistent dollar figure -- \$9.8 million -- to describe environmental mitigation costs for several project alternatives, including the 1992 LPA, 1995 LPA, and Options B and X. The DEIR/SDEIS and FRDEIR/S#2DEIS have demonstrated that environmental impacts may vary considerably among those alternatives....The costs of mitigating the endangered species and wetlands impacts of either Option B or Option X may be considerable. The consistent use of one amount of environmental mitigation costs across substantially different project alternatives undermines the accuracy of...that cost estimate. Before a final decision is made to pursue any project alternative, BART should thoroughly delineate the environmental mitigation costs for each alternative.

Response. Mitigation measures are currently being reviewed by BART, SamTrans, the San Francisco International Airport (SFIA), and all affected resources agencies. A more precise estimate of mitigation costs cannot be provided until these discussions are completed.

The approximately \$10 million "Mitigation of Environmental Impacts" line item seen in Table 6-1 associated with several alternatives is a conceptual estimate of the amount required to cover mitigation costs associated with mitigation of biological impacts on airport property west of Highway 101. Design Option V-B, which terminates in San Bruno and does not approach the wetlands areas, does not include this element in its capital costs.

The same figure is appropriate for several alternatives based on the level of detail provided by preliminary engineering, and the state of discussions with interested parties, including the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Game (CDFG), U.S. Army Corps of Engineers (ACOE), and the SFIA as the property owner, prior to selection of an LPA. Further engineering and environmental studies and continuing discussions with interested parties will result in refinements to the costs associated with mitigation of environmental impacts to this sensitive area.

The "Right of Way" line item includes mitigation costs associated with purchase of land in Millbrae for street widening, cultural resource preservation, biological mitigation, and noise mitigation. The "Line" line item includes mitigation costs associated with road modifications, sound walls, construction measures designed to mitigate noise/vibration impacts, and landscaping mitigations. The "stations" line item include funds for hydrological mitigation measures.

- 16.8. Jason Yuen, an architect and consultant hired by the San Francisco Airports Commission, has estimated that Options B and X may create significant additional cost impacts as a result of construction of the aerial wye-stub and aerial BART station adjacent to the SFIA International Terminal....Option B may create at least \$81.5 million in additional costs that are not reflected in the FRDEIR/S#2DEIS; while Option X may result in at least \$19.7 million in additional costs as well as additional unspecified costs associated with redesigning the SFIA North Ground Transportation Center.

Response. Inclusion of the Aerial Design Option LPA in the SFIA master plan construction program will result in design costs to the airport. The airport will offset these costs against its maximum \$200 million contribution.

- 16.9. Yuen found that Option B may create \$40 million in costs to SFIA, as well as an annual concession loss of \$4 million. Option B also would cause \$17.6 million in escalation costs for delays to the SFIA Master Plan development, made necessary by the redesign and coordination work required for a BART station inside the SFIA International Terminal. These costs to SFIA appear significant and unavoidable, and BART should reflect them clearly in its cost considerations.

Response. Please refer to Response 16.8 for a discussion of airport costs associated with the BART extension.

- 16.10. Both Options B and X involve other additional costs not reflected in the FRDEIR/S#2DEIS. Placement of an aerial BART station in or adjacent to the SFIA International Terminal will require an additional expenditure of at least \$1.7 million on the Airport Light Rail System ("ALRS") planned for SFIA.

Response. Please refer to Response 16.8 for a discussion of airport costs associated with the BART extension.

- 16.11. Even more significantly, placement of aerial structures on SFIA's west of Bayshore parcel will require the relocation of PG&E electrical transmission lines that traverse that property. Yuen has estimated that the cost of relocation for those transmission lines will be at least \$18 million. Yet, this cost does not appear to have been included in BART's capital cost estimates. All such additional costs should be included in those estimates so that BART and the project's other financial sponsors may be able to assure a successful BART-SFIA connection.

Response. BART and PG&E are currently in the process of determining the method and total cost of relocation. The cost of relocating the PG&E transmission lines has been included in the project conceptual capital costs under Right-of-Way Costs (Table 6-1).

Please see Response 6.75 for a discussion of development of a financial plan.

- 16.12. The capital cost estimates for Options B and X also may not accurately reflect overall inflationary effects brought about by significant changes in the commencement schedule for the BART-SFIA project. Those estimates were prepared "using 1996 dollars and estimated at midpoint of construction." The original decisions to calculate capital costs in terms of 1996 dollars was based upon an assumption that the midpoint of construction would be 1996. However, because of the litany of changes as to what constituted the "proposed project," not only will the midpoint of construction not occur in 1996, construction may not even have commenced by then.

Response. The midpoint of construction has moved beyond 1996 as BART and SamTrans have worked with communities, resource agencies, funding agencies, and FTA to define a project that meets the stated objectives of the BART extension. Inflation will be taken into account in determining the final capital costs for the project.

Please refer to Response 16.3 for a discussion of estimated capital costs included in an environmental document.

- 16.13. Goods and services purchased at a date later than anticipated will, of course, cost more because of the effects of inflation, and BART's cost estimates should reflect this, given that the midpoint of construction will occur years later than originally anticipated. Notwithstanding this, the FRDEIR/S#2DEIS does not explain how construction of this project can occur much later than

originally anticipated without having project cost estimates rise commensurably. The absence of an adjustment for the effects of inflation undermines the reliability of these capital cost estimates and the prospects for a successful completion of the BART extension.

Response. Because of the design-build process, inflation will take less of a toll on capital costs than would be true for other projects. A one-time bid on the approximately six contracts will keep inflation from increasing capital costs as the project progresses.

Please refer to Response 16.12 for a discussion of inflation of the project's capital costs, and estimated capital costs included in an environmental document.

- 16.14. The capital cost estimates in the FRDEIR/S#2DEIS are ostensibly presented in "constant" 1996 dollars so as to screen out the effects of inflation over time. However, several of the project's major sponsors appear to have made funding commitments in "nominal" dollars -- that is, funding commitments that do not grow over time, regardless of the effects of inflation or delays in the commencement of construction. Thus, while BART's cost are presented so as to make it appear that they will remain constant in relation to stated funding commitments, there may in fact be an ever increasing gap between growing costs and static funding. Such a gap makes the prospects for obtaining full project funding all the more uncertain.

Response. If project costs were denominated in 1997 dollars, they would increase by 3.5 percent, or roughly \$37 million. This increased cost would be covered by an increase in the FTA share to \$750 million. This amount is still less than the \$800 million FTA share for Alternative VI. The current project schedule calls for the major construction contracts to be awarded in 1997. Since the construction contracts will not include an annual inflation escalator component, the final nominal project costs for the project will be approximately equal to the 1997 dollar costs.

- 16.15. The FRDEIR/S#2DEIS identifies a "savings" in project costs -- attributable to the development of an Aerial Design Option in place of the Alternative VI - Tunnel Option -- on the order of \$195 million for Option B and \$213 million for Option X. Those "savings" attributable to the selection of an Aerial Design Option would be allocated in three ways: (1) to eliminate the unfunded local share; (2) million (Option X); and (3) to reduce the SFIA contribution from \$200 million to \$171.5 million (Option B) or \$167.8 million (Option X). The relative "savings shares" of the FTA and SFIA are allocated on an 80/20 basis. However, the capital cost estimates used to calculate the "savings" attributable to Options B and X are based upon the questionable cost estimation methodology discussed above. Consequently, the cost estimates for Options B and X, as well as Alternative VI, already may be seriously underestimated. Additionally, the costs associated with mitigating the endangered species habitat impacts of this project may be markedly greater than estimated in the FRDEIR/S#2DEIS. All this would mean that Alternative VI would cost far more than \$1.269 billion, and that Options B and X may cost nearly as much as Alternative VI previously was projected to cost. Any "savings" that may have been attributable to the selection of an Aerial Design Option would not be realized.

Response. Please refer to Response 16.3 for a discussion of estimated capital costs included in an environmental document.

- 16.16. This uncertainty concerning the possible erosion of savings attributable to Options B and X is important in light of the serious reservations expressed by Congress about the costs of Alternative VI and its stated desire for BART to develop less costly alternatives for a BART-SFIA connection. Option B was developed by BART in response to that Congressional directive and, at first blush, appears to generate significant savings over Alternative VI. However, if the projected savings are eviscerated and this project once again costs in the neighborhood of \$1.2 billion, Congress may be unwilling to continue federal participation in its development. Without federal funding, a BART connection to SFIA will be impossible. Consequently, in order to ensure continued federal

participation. BART should attempt to define the true savings, if any, attributable to the adoption of an Aerial Design Option.

Response. BART, SamTrans, and MTC continue to work closely with Congress to determine appropriate levels of federal participation. A complete financial plan will be publicly presented when it is thoroughly developed. Please also refer to Response 6.75 for a discussion of the project financial plan.

- 16.17. The FRDEIR/S#2DEIS should define...more clearly and accurately the potential and committed funding sources for a BART extension. Considerable uncertainty exists with respect to several of the key funding sources for this project, raising questions about the financial viability of Options B and X.

Response. The financial plan process parallels the environmental process, and BART, SamTrans, MTC, and FTA are working closely with other agencies to bring all required resources together to cover the capital costs of the Aerial Design Option LPA. The proposed financial plan shown in the DEIR/SDEIS reflected the general level of detail before an LPA, with its associated conceptual cost estimates, was selected. A revised financial plan based upon the Aerial Design Option LPA is shown in Volume I of this FEIR/FEIS. A detailed financial plan will be defined before selection of a project by the BART and SamTrans boards, anticipated in the second quarter of 1996. Please refer to Response 6.67 for a discussion of financial information provided in an environmental document.

- 16.18. Although the BART-SFIA project relies upon federal contributions on the order of \$685.8 million for Option B and \$671.4 million for Option X, by BART's own account the project is far from that goal in terms of committed funding. In fact, the uncertainty of literally hundreds of millions of dollars in anticipated federal funding should give the project sponsors reason to pause to assess the financial viability of these alternatives and the likelihood of accomplishing this project's goal -- completion of the BART extension.

Response. Please refer to Response 16.16 for a discussion of federal participation in the project.

- 16.19. Although Congress made a non-binding statement in 1991 to authorize \$590.7 million for the BART-SFIA project, only \$301 million actually has been authorized for this project to date under the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)...According to the FTA, only \$194 million of that authorization remains available for this project. Furthermore, even those funds actually "authorized" still must be appropriated by Congress, subject to availability, during the annual appropriations process.

Response. BART and MTC will seek the authorization of additional funds for the project when the Intermodal Surface Transportation Efficiency Act (ISTEA) is reauthorized for fiscal years 1998 and beyond.

- 16.20. Concerns about "significant unresolved issues" prevented Congress from making a "long-term financial commitment" to this project in the recent appropriations process, leading to a 50% reduction in the fiscal year 1996 appropriation for the BART-SFIA project....Given this expression of Congressional concern, it is important that BART address those unresolved issues clearly and forthrightly, and provide a realistic assessment of this project's costs and finances. Otherwise, even the funds already authorized for this project may not become available as the project sponsors have anticipated.

Response. In response to congressional concerns about project funding, BART and SamTrans are developing a financial plan that identifies specific cash flow needs, as well as the project proponents' ability to meet those needs over the construction period. Please also refer to Response 6.75 for a discussion of the project financial plan.

- 16.21. BART has acknowledged that it will require an additional \$289.7 million in contingent ISTEA funds on top of the existing \$301 million authorization, to reach the \$590.7 million that Congress indicated in 1991 that it intended to give to this project. However, ...the FTA has indicated that the BART-SFIA project is among nine projects with aggregate funding needs of \$2.1 billion competing for only \$1.6 billion in contingent commitment capacity under ISTEA. Thus, it is unlikely that BART will be able to secure 100% of its contingent funding needs at the expense of other projects already receiving federal funds.

Response. Please refer to Response 16.16 for a discussion of federal participation in the project.

- 16.22. BART must enter into a Full Funding Grant Agreement ("FFGA") with the FTA in order to obtain the federal contribution identified in the financing package. However, in an August 1995 letter to BART, the FTA Administrator pointed out that any FFGA with BART would have to be entered into under the FTA's "'contingent commitment' authority," meaning, as noted above, that funding would depend upon Congress appropriating funds in the next authorization period. Additionally, as noted previously, Congress has instructed the FTA to report back to the House and Senate Appropriations Committees 60 days before entering into any FFGA for the BART-SFIA project, to provide Congress an opportunity to ensure that its remaining concerns about this project have been addressed. These factors highlight the tenuous nature of funding for this project.

Response. Please refer to Response 16.16 for a discussion of federal participation in the project.

- 16.23. Finally, BART anticipates that Options B and X will require an additional \$80-95 million in federal funding beyond the \$590.7 million sought under ISTEA. Notably, BART has not identified any potential sources for this additional federal contribution. In fact, the FRDEIR/S#2DEIS acknowledges that "[i]t is possible that the additional funding requirements would extend the amount of time it will take to fully fund the BART...project." Before selecting a final project option, BART must be able to identify committed funding sources sufficient to meet the full federal contribution called for in the FRDEIR/S#2DEIS. Otherwise, the prospects for a BART-SFIA connection will be in serious jeopardy.

Response. BART and MTC will seek authorization for additional project funds, as described in Response 16.19. In addition, BART, MTC, Santa Clara Transit, and SamTrans will adopt an amended Memorandum of Understanding (MOU) on the region's apportionment of FTA New Rail Starts funds, which will show the increase in BART funding being offset, in part, by reduced FTA New Rail Starts funding for the reduced-scope Tasman light rail project.

The BART extension will not go to bid before a complete financing plan is completed and agreed upon by all affected parties.

- 16.24. Although the FRDEIR/S#2DEIS calls for a significant funding commitment from SFIA, actual airport funding sources may be limited, thus constraining the ability of SFIA to contribute to this project. Option B calls for a \$171.5 million contribution from SFIA, while Option X requires \$167.8 million. While SFIA has in fact expressed its willingness to provide up to \$200 million toward this project, FAA statutory and regulatory restrictions may prevent an SFIA contribution of such magnitude. Thus, before a final project decision is made, BART should provide a more precise picture of how much SFIA funding actually will be available.

Response. Please refer to Response 12.27 for a discussion of SFIA's contribution.

- 16.25. Significant restrictions exist on the use of Airport Improvement Program ("AIP") grants, Passenger Facility Charge ("PFC") funds, and other airport revenues for any BART-related purpose....BART has not distinguished between eligible and ineligible project elements in light of these funding constraints. Nor does the FRDEIR/S#2DEIS identify the cost of each individual on-airport element so that the total

cost of all eligible project elements could be ascertained. BART has not even identified whether, and to what extent, SFIA will retain ownership and operation of certain on-airport portions of this project -- and, if so, how. All of these considerations are important to the question of how much funding SFIA will be able to contribute to the BART-SFIA project.

Response. Please refer to Responses 6.75 and 12.27 for a discussion of the financial plan and SFIA's contribution.

- 16.26. BART has maintained that funding negotiations between it and SFIA will be completed by the end of 1995. Regardless of whether that ambitious goal will be met, BART has not yet identified an amount that it reasonably may expect as a result of those negotiations. Given the restrictions on the use of aviation funds, SFIA may not be able to contribute more than \$100 million toward this project. Though both BART and SFIA may have the best of intentions in this context, such external limitations on SFIA's ability to contribute have the potential to undermine this project's financial viability. Making a final project decision subject to such uncertainty may not be advisable.

Response. Please refer to Response 16.25 for information regarding the status of discussions between BART and the SFIA. As stated previously, the BART extension will not go to bid before a financing plan is in place, and agreed to by all affected parties. Please see Response 6.75 and 16.3 for a discussion of development of a financial plan.

- 16.27. The capital financing projections in the FRDEIR/S#2DEIS rely upon a full \$98 million commitment in California Transit Capital Improvement ("TCI") funds from the California Transportation Commission ("CTC"). The BART-SFIA project has in fact received \$14.6 million in TCI funds, during the 1994 fiscal year, and the CTC has recommended an additional \$5 million in funding for fiscal year 1996. Based upon its history of receiving TCI funds, BART projects that it will receive the remaining \$78.4 million over the next four to six years. Those funds, however, appear more uncertain than BART has indicated. California has experienced significant budget constraints in recent years, and the CTC in fact has been unable to meet its TCI commitments for the current fiscal year. In light of such shortfalls, the likelihood of continued robust state funding becomes more remote.

Response. The commentor's opinion is noted. Recent correspondence from the CTC to the U.S. General Accounting Office reaffirms the state's long-standing commitment to BART's extensions program.

- 16.28. If the CTC is unable to provide the remaining \$78.4 million anticipated state contribution, SamTrans will be required to make up any shortfall dollar-for-dollar. That obligation would come on top of SamTrans' preexisting obligation to provide \$99 million toward this project, and might prove more than it could handle given the limitations on funding sources available to SamTrans. Consequently, uncertainty as to the reliability of any state contribution raises another flag of caution and counsels this project's sponsors to conduct a sober and realistic review of the financial viability of the proposed Aerial Design Options.

Response. SamTrans will not make up any shortfall in CTC funds. SamTrans' own financial capacity analysis concludes that the agency can contribute \$185 million to the BART Extension over the next four years without jeopardizing its ability to meet existing service commitments.

Please refer to Response 6.67 for a discussion of SamTrans' capacity to fund its portion of the BART-San Francisco Airport Extension.

- 16.29. The FREDEIR/S#2DEIS identifies two new "committed" sources of funding for the BART-SFIA project. BART anticipates receiving \$10 million in state bond proceeds associated with Proposition 116. Those proceeds have been slated for SamTrans expenditures on BART within San Mateo County. Additionally, BART has identified \$10 million in anticipated toll revenues from the San

Francisco-Oakland Bay Bridge. In fact, no Proposition 116 funds actually have been committed to this project, and only \$1 million in toll revenues have been committed. Though BART may have reasonable expectations that it will receive at least some of these anticipated revenues, it does not seem accurate to reflect the full \$20 million as “committed” funds. BART should clarify the status of these funds, so that project decision makers can make a fully informed decision based upon reliable and accurate financial figures. “Committed” funds should be those funds that have clearly been allocated to BART-SFIA and that may be relied upon to see this project to a successful conclusion.

Response. The Proposition 116 funds included in the project’s financial plan are restricted by the State of California Public Utilities Code Section 99637 “for expenditure for extensions of the San Francisco Bay Area Rapid Transit District within San Mateo County.” These funds were not needed to implement the Colma extension, and are therefore available for the BART–San Francisco Airport Extension. The West Bay toll revenues are also restricted by statute for rail extension and improvement projects in San Francisco, San Mateo, and Santa Clara counties. The distinction between committed and uncommitted funds was developed at FTA’s suggestion to distinguish funds that require additional legislation from those that do not. These Proposition 116 and West Bay toll revenue funds are committed in the sense that no additional legislation, such as the reauthorization of current federal transportation funding programs, is required to secure them for the project.

- 16.30. The presence of threatened and endangered species and their habitat on the west of Bayshore site is an issue that potentially undermines BART’s ability to proceed with Options B or X, or, alternatively, could result in substantially greater mitigation costs than have been identified. The California Department of Fish and Game (“DF&G”) and the U.S. Fish and Wildlife Service (“F&WS”) have made a number of statements in previous comments and meetings concerning impacts on the endangered San Francisco garter snake (“SFGS”) that may be problematic. Because BART has not resolved all pertinent issues with these resource agencies, there are some important unknowns that may affect the cost of Options B and X and ultimately the viability of the project.

Response. With regard to the cost of mitigation for impacts to biological resources, there is no distinction between Options B and X because the options differ only in their connection with the International Terminal. BART is continuing to work with the USFWS, CDFG, and the COE to develop appropriate mitigation for project impacts. Please see Volume V of the DEIR/Technical Appendix for a summary of mitigations proposed for potential endangered species and wetlands impacts.

- 16.31. According to the FRDEIR/S#2DEIS, Options B and X would have significant impacts on the habitat of the SFGS, the California red-legged frog, and the San Francisco forktail damselfly in the west of Bayshore parcel. The FRDEIR/S#2DEIS discussion of construction-related impacts on the SFGS caused by Options B and X points out the F&WS’s concerns regarding the threat to the continued viability of the SFGS population posed by direct or indirect impacts. Meeting notes received from the DF&G indicate that implementation of Option B or Option X would result in substantial impacts to foraging, breeding and hibernacula areas for the SFGS, and that the F&WS is concerned that such impacts would extirpate the SFGS population, given conditions at the west of Bayshore site. Under the circumstances, the issue of impacts to SFGS habitat and mitigation for such impacts must be carefully addressed and the approval of the resource agencies to proceed with this development must be obtained.

Response. Please refer to Response 7.12 for a discussion of the steps BART has taken to obtain concurrence on impacts and mitigation measures.

- 16.32. The FRDEIR/S#2DEIS reports that implementation of Option B or Option X would displace and/or eliminate a total of 10.46 acres of upland and wetland habitats for the SFGS. This 10.64 acres apparently includes .89 acres of wetland habitat for the SFGS, the California red-legged frog, and the San Francisco forktail damselfly. The Final EIR/EIS should explain what effect this habitat loss (both

wetlands and uplands) will have on the SFGS and other species of concern, including, among other things, (1) current population figures for the species, (2) estimates of reductions in their numbers associated with implementation of Options B and X, and (3) the effect of the population reduction of these species on the west of Bayshore site on the overall viability of each of these species.

Response. Please refer to Response 51.1 for a discussion of the current status of the San Francisco garter snake (SFGS) population. California red-legged frog surveys, conducted in September and October 1993, found a total of 17 frogs. No San Francisco forktail damselflies were found in the west of Bayshore parcel during September and October 1993 surveys.

It is not possible to accurately estimate the expected reduction of the three sensitive species populations for each alternative. This analysis thus considered any reduction of an endangered species population significant. The loss of any one local population would contribute to the endangerment of the species, but would not necessarily result in the extinction of the species. The proposed project alternatives are not expected to eliminate any local populations of the San Francisco forktail damselfly or the California red-legged frog. Of greater threat to the red-legged frog on the west of Bayshore parcel is the presence of bullfrogs throughout the site. Populations of the San Francisco forktail damselfly are scattered throughout the parcel, and the elimination of any single population would not necessarily mean that the species would be eliminated from the site. Trespassing, poaching, loss of prey species due to increased competition with bullfrogs, loss of habitat, and drought have all contributed to SFGS decline in the west of Bayshore parcel. The BART project may contribute to or hasten this decline. The population may also continue to decline without the BART project because of continued degradation of habitat. The loss of the west of Bayshore parcel SFGS population would result in the loss of one of the remaining six known populations in existence and may represent the loss of genetic variation. Extinction of this population would not represent the eventual extinction of the species, but could contribute to the extinction of the species. It should be pointed out that after reviewing the Biological Assessment and status of the SFGS and California red-legged frog, the USFWS concluded that the proposed Aerial Design Option LPA would "not likely jeopardize the continued existence of these species" in their Biological Opinion.

- 16.33. The FRDEIR/S#2DEIS states that Mitigation Measure 2.1 consists of various management practices that will be implemented by BART to improve the habitat quality of existing wetlands. The FRDEIR/S#2DEIS provides few specifics of these "management practices", other than one example: the repair and maintenance of the tidal gate to Cupid Row Canal. The Final EIR/EIS should provide a more detailed description of Mitigation Measure 2.1, including the estimated costs associated with the measure and whether those costs have been included in the budgets for Options B and X.

Response. Please refer to the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS for a detailed discussion of BART's mitigation measures. Management practices for endangered species habitat proposed in the FRDEIR/S#2DEIS were developed in coordination with the USFWS and the SFIA. Costs for wetland and endangered species mitigation have been estimated and provided for in the project budget, as presented in Chapter 6. As mitigation measures are more fully defined with input from resource agencies and property owners, these costs will be included in the Full Funding Grant Agreement with the FTA.

The conceptual cost of mitigations has been included in the cost estimates seen in Table 6-1 of this FEIR/FEIS.

- 16.34. In addition, Mitigation Measure 2.1 does not appear to propose any mitigation for impacts to upland habitat for the SFGS. One recent study of the SFGS on the west of Bayshore site shows that the SFGS uses rodent burrows or debris piles in upland areas near feeding sites (i.e., canals and seasonal wetlands) for nightly retreat during the early Spring through late Fall period, and that the SFGS may hibernate in these or other upland burrow systems throughout the entire west of Bayshore site. The

Final EIR/EIS should explain how Mitigation Measure 2.1 mitigates loss of upland habitat for the SFGS, or why such mitigation is not required, if that is the case.

Response. During the formal Section 7 consultation process with the USFWS, BART developed suitable mitigation measures for upland sites that consist of restoration of temporarily disturbed sites and compensation for both temporarily and permanently disturbed sites at approved on-site and off-site locations. One of the reasons postulated by the USFWS for the reduction of the SFGS population on the west of Bayshore parcel is a lack of food sources due to the introduction of bullfrogs and the limited breeding habitats for the red-legged frog during drought conditions. The mitigation measures for impacts to the SFGS have been approved by the USFWS through the Section 7 consultation process and issuance of a Biological Opinion, as presented in Volume V of this FEIR/FEIS.

- 16.35. Mitigation Measure 2.2 involves the implementation of an HRP for the SFGS that was originally proposed in 1992. The HRP involves the establishment of a permanent preserve in the southern 18 acres of the west of Bayshore parcel designed to sustain a viable breeding population of the SFGS. The proposed mitigation measure raises several issues. The [Department of Fish and Game] DF&G expressed serious concerns regarding the HRP's efficacy in its March 13, 1995 comments on the DEIR/SDEIS. The DF&G stated that the endangered species impact mitigation measures, and in particular, the HRP, would be insufficient to allow for maintenance of a viable SFGS population on the site. A question remains whether the resource agencies will change their views and be willing to consider this same HRP to be adequate mitigation for the impacts of Options B or X.

Response. Suitable and appropriate mitigation measures for unavoidable impacts to the SFGS have been agreed upon and approved by the USFWS, California Department of Fish and Game (CDFG), the SFIA, and BART and are presented in Volume I, and in the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS. These mitigation measures do not include the Habitat Restoration Plan because of the concerns and objections expressed by the CDFG in their comment letter of March 13, 1995.

- 16.36. The FRDEIR/S#2DEIS provides no estimate of costs associated with Mitigation Measure 2.3. It is likely that implementation of this measure would significantly increase the cost of Options B and X, because it would require funds to purchase land for a SFGS preserve and to cover the costs of studies, construction and maintenance of the preserve. Even though the specific site for Mitigation Measure 2.3 has not been identified, the Final EIR/EIS should provide at least a rough estimate of the projected costs and clarify whether such costs have been included in the budget estimates for Options B and X.

Response. Costs for project mitigation in the area of compensation for biological impacts would not differ between Options B and X because the options differ only in their connections to the International Terminal. General estimated costs for offsite mitigation are included in the project's conceptual cost estimate.

- 16.37. In terms of construction-related impacts on the SFGS, the FRDEIR/S#2DEIS proposes a number of mitigation measures for such impacts, including clearance of the SFGS from all construction sites, removal of the snakes to a facility outside the west of Bayshore site as part of a captive feeding program, and erection of exclusion fences around construction areas to prevent the snakes from reentering into those areas. In light of the F&WS's conclusion that any direct or indirect impact could result in extirpation of the SFGS population and the conclusion in the Larsen study suggesting the sensitivity of the SFGS, the Final EIR/EIS should confirm that the SFGS population has the ability to survive this offsite removal.

Response. As stated in Response 12.16, there is evidence that the SFGS is able to survive well in captivity. Specific mitigation measures involving captive breeding of the SFGS will be designed in consultation with, and would be approved by, the USFWS. The USFWS has concluded in its

Biological Opinion that the proposed project would not likely jeopardize the continued existence of the species.

Specific tasks and elements of the approved mitigation program are defined in Volume I and in the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS.

- 16.38. It appears that...more information is necessary to determine whether the presence of the SFGS and other protected species will preclude the completion of the project as proposed under Options B or X.

Response. More information is not necessary since the existence of SFGS populations and other protected species in the area has been adequately characterized. The formal Section 7 consultation process with the USFWS has been completed. Through this process mitigation measures have been developed to allow the construction of the BART–San Francisco Airport Extension, while preserving a sustainable breeding population of SFGS on the west of Bayshore parcel. The mitigation measures are contained in the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS.

- 16.39. Construction of Options B and X raises concerns regarding possible exacerbation of existing hazardous materials contamination in the soil and groundwater, particularly on SFIA property. This issue should be carefully analyzed and addressed. The FRDEIR/S#2DEIS offers little information concerning the potential impacts posed by Options B and X because of existing contamination underlying SFIA or in other areas of the project corridor. The document simply states that sites of hazardous contamination identified during site investigations would be remediated or mitigated.

Response. A more detailed discussion of potential impacts from existing hazardous materials contamination on the SFIA property and other areas of the project corridor is presented in Section 3.13 of the DEIR/Technical Appendix. Specific construction techniques to prevent the spread of remaining contamination are also described in Section 3.13 of the FRDEIR/S#2DEIS.

- 16.40. The FRDEIR/S#2DEIS [does not] identify the magnitude of the threat to groundwater posed by these options. Again, all that is provided is a brief statement that Options B and X potentially could contaminate an underlying aquifer. This reference does not even appear to relate to the Westside Basin Aquifer connected to the SFIA property.

Response. Please refer to the DEIR/Technical Appendix pages 3.8-18 and 3.13-148, respectively, for mitigation measures to minimize the long- and short-term exposure of local water supplies (underlying aquifers) to contamination from the shallow perched aquifer. These measures provide mitigation for the general protection of surface and groundwater quality. Where applicable, these measures would be implemented to protect the Westside Basin Aquifer beneath the SFIA property.

- 16.41. In order to fully evaluate Options B and X, additional information is needed concerning, at a minimum, the potential groundwater impacts discussed above. The Final EIR/EIS should analyze these potential impacts and their costs, and should propose appropriate mitigation measures for any such impacts. Perhaps the most serious concern in this regard is the potential for litigation relating to these impacts, and the attendant additional financial burdens on BART's implementation of Option B or Option X, to delay the project, cause adverse publicity, or result in other factors that might jeopardize the project.

Response. Please refer to Response 16.40 for a discussion of local water supply mitigation measures. Existing conditions will be determined prior to construction, at which time contamination issues will be mitigated as detailed in the DEIR/Technical Appendix pages 3.8-18 and 3.13-148.

A site for Mitigation Measure 2.3 was identified and the cost considered in project budgeting prior to inclusion in the FRDEIR/S#2DEIS. Mitigation for endangered species was considered in project budget costs and incorporated into the conceptual cost estimates seen in Table 6-1. As the details of

mitigation efforts for the endangered species will not be finalized until after the biological opinion has been issued by the USFWS.

Groundwater impacts were considered for all alternatives that affect the airport property, including Options B and X. No significant differences regarding groundwater impacts were identified in the FRDEIR/S#2DEIS, as compared to the DEIR/SDEIS. Testing regarding the contents of subsurface materials, including geotechnical studies, hazardous materials, and groundwater volumes, would occur during final design in order to assure avoidance or protection of the aquifer.

- 16.42. The transit projections contained in the FRDEIR/S#2DEIS may be based upon a flawed regional travel demand model, resulting in uncertainty as to the real transit benefits of a BART-SFIA connection. The inaccuracies in the model as well as the growing interest of Congress and local transportation agencies in a CalTrain connection to the airport counsel in favor of BART taking the necessary steps to provide adequate justification for its conclusions about the transit benefits.

Response. The MTC travel demand model, used to estimate transit patronage under the alternatives studied, is the FTA-approved regional model. Please refer to Responses 6.6 and 6.25 for additional discussion of the model.

- 16.43. The Peninsula Corridor Joint Powers Board, the San Mateo County Transportation Authority, and the San Mateo County Transit Districts ("SamTrans") have joined together, in cooperation with the San Francisco Airports Commission, to conduct a \$100,000 study of a possible CalTrain link to the SFIA ALRS, somewhere west of Highway 101 in the SFIA vicinity. Furthermore, CalTrain already has decided to extend its line to downtown San Francisco. Both of these developments have the potential to effect significant changes in the transit ridership projections for the BART extension.

Response. Please refer to Response 4.9 for a discussion of connectivity between the ALRS and CalTrain. In addition, please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study. Please refer to Response 6.8 for a discussion on the CalTrain downtown extension.

- 16.44. Indeed, Congress has identified the uncertainty over the effects of a possible CalTrain-ALRS link as one of the main factors in its current unwillingness to make a long-term financial commitment to this project. In fact, the ability of BART to secure a Full Funding Grant Agreement from the FTA has been expressly conditioned by Congress on BART's ability to address, among other things, the potential impact of a CalTrain-SFIA link on the BART extension project. Congress may be further concerned about the conclusions and recommendations of the 1995 Grand Jury which advocates abandoning the BART-SFIA project for the CalTrain connection to the ALRS because it achieves the same goal at far less cost.

Response. The FFY 1996 Conference Report noted an interest in a CalTrain link to the SFIA. The study of a direct CalTrain link to the airport was begun by a consultant team retained by SamTrans at the end of December 1995, and is expected to be completed by fall of 1996. The intent of this study is to determine possible supplementary CalTrain Airport connection service, and not to duplicate or supplant service of the BART extension.

MTC, SamTrans, the Chairman of the SamTrans Board of Directors, State Senator Kopp, BART, the President of the BART Board of Directors, and other BART boardmembers have prepared Responses that delineate the large number of factual inaccuracies, the lack of objectivity, and the false assumptions used in the grand jury report. While the report did advocate connecting the CalTrain line to the ALRS and extending the line to downtown San Francisco, the cost estimates given were off by up to one billion dollars.

- 16.45. The possibility of a CalTrain-ALRS link also may renew demands for an intermodal station linking BART, CalTrain, and the ALRS all in one location. Such an intermodal connection may appear to

create potentially greater benefits in terms of improved transit ridership and greater convenience for riders from all parts of the region. Consequently, BART must be cautious in making its transit projection for Options B and X, lest its inability to defend them undermine its ability to maintain public and governmental support for its expansion plans.

Response. Please refer to Response 4.9 for a discussion of connectivity between the ALRS and CalTrain. Please also refer to Response 13.4 for a discussion of the CalTrain-ALRS Connection Feasibility Study.

- 16.46. The transit projections presented in the FRDEIR/S#2DEIS are based upon the same criteria and methodology used in the DEIR/SDEIS to determine and assess the transit impacts for the various BART-SFIA alternatives. That methodology relies upon a regional travel demand model that has been "adjusted" in a number of ways. Those adjustments to the FTA-approved model were justified by reference to limitations caused by missing data for some years, failure to run the model for certain project alternatives, inconsistent mode choice model results, undercounting of work trips, areas where the model does not contain sufficient detail, and other "model-generated inconsistencies." Unfortunately, these adjustments appear to undermine the transit forecasts made using that model.

Response. The MTC travel demand model is the FTA-approved model for the Bay Area region, and this model was used for making transit patronage projections. Adjustments to the model results were only made to correct minor inconsistencies among alternatives in the model and were done in consultation with MTC. All modeling assumptions used in the BART extension environmental documents are consistent with other studies conducted in the region that have used the MTC model. The commentor may be referring to adjustments made for the traffic modeling work. These changes are not adjustments to the MTC model results, but rather a factoring exercise to convert person trip data to peak hour vehicle trip data, which is not directly available from the MTC patronage projections.

The MTC model is not appropriate for use in forecasting turning movement at specific locations. As done by the Congestion Management Agencies of local counties, subarea models are used to forecast volumes on local roadways that are not included in MTC's travel demand model. To calibrate these subarea models to be as accurate as possible, field counts are used for comparison to the model's results. The process used to adjust the subarea model results to individual intersection turning movements is accepted industry practice.

Adjustments included micro-corrections to the model where localized effects were not addressed, e.g., walk versus transfers to the Airport Light Rail System (ALRS) at the Airport International BART Station, and adjusting the number of trips at the request of the cities to reflect trips not included in the MTC model, e.g., the SFIA Master Plan growth beyond projections by the Association of Bay Area Governments (ABAG). The other correction referred to in the comment was not an adjustment, but rather the conversion of the person trip tables into vehicle trip tables used for the traffic analysis.

Please also refer to Response 6.6 for additional information on the model.

- 16.47. Transit projections should be made based upon regional travel models approved by the FTA. FTA approval assures that the model's projections are both sound and reliable. Changes to an FTA-approved model generally will be justified based on substantive analytical reasons. No satisfactory justification was provided in the BART-SFIA environmental documents for the adjustments that were made to the travel model in this case, other than that they provided undesirable results. There is no apparent evidence that the FTA approved any of the adjustments, nor is there any comparison of the assumptions used in the BART-SFIA model to approved regional modeling data in order to determine whether those assumptions are consistent with other studies conducted in the region.

Response. The environmental documents prepared for the BART extension project, including the AA/DEIS/DEIR, DEIR/SDEIS, FRDEIR/S#2DEIS, and FEIR/FEIS, were prepared by SamTrans, FTA, and BART. FTA is the lead federal agency and has approved the adjustments described as one of the authors of the documents. The transit patronage projections for all the alternatives studied in the DEIR/SDEIS are based on the MTC travel demand model, the FTA regionally approved model. The Transportation Technical Report, a supporting document to the DEIR/SDEIS, contains information about adjustments made to the MTC model results which were performed with the concurrence of MTC staff. Please refer to Response 16.46 for further discussion on adjustments made to the MTC model.

- 16.48. BART's reliance upon a travel model that appears not to have been approved by the FTA may make its ultimate project decision vulnerable to questions about the reliability of its transit projections. The BART-SFIA transit projections must be based upon a defensible, FTA-approved regional travel model. Alternatively, BART must explain the many adjustments made to the model it has used. All of the funding participants in the project, including the federal government and SFIA, will be required to assure themselves and their constituents that their investments will provide the greatest possible transit benefits for each marginal dollar spent. The transit projections and methodology described in the FRDEIR/S#2DEIS may not be sufficient to provide the kind of assurance they need.

Response. Please refer to Responses 16.46 and 16.47 for discussion of the FTA-approved regional travel model.

- 16.49. The transit projections contained in the FRDEIR/S#2DEIS do not appear to provide clear and consistent support for Options B or X. Not only are the benefits associated with the transit projections for Options B or X relatively comparable to projections for less expensive alternatives, it also appears that travel times and BART ridership to SFIA actually would not improve by switching to the new options. Consequently, the existence of less expensive alternatives with better projected travel times and ridership numbers may expose the newly proposed design options to public criticism and funding uncertainty.

Response. Following the direction of MTC and Congress, less expensive alternatives to the Alternative VI LPA were examined. One of the objectives in developing such alternatives was to maintain local support, while meeting the goals of the proposed BART extension. The objective of reducing project costs by \$200 million, while only reducing the transit patronage by a small number of trips, was achieved by both Aerial Design Options B and X. Regional transit person trips, or linked trips, would increase by 23,200 trips under the Aerial Design Option LPA compared to the No Build Alternative in 2010, whereas these linked trips would decrease by only 200 trips under the Aerial Design Option compared to the Alternative VI LPA. The cost-effectiveness index, which includes estimates of capital costs, operating and maintenance costs, travel time savings and transit trips, is \$26.37 under the Aerial Design Option LPA compared to \$28.76 under the Alternative VI LPA and \$25.34 under the 1992 LPA. The Aerial Design Option LPA includes an airport station adjacent to the new Airport International Terminal, whereas the 1992 LPA includes an Airport Intermodal Station west of the SFIA and west of Highway 101, requiring all BART patrons to transfer to the proposed ALRS.

- 16.50. Although the most recent design options are projected to provide slightly greater annual ridership than previous alternatives, the significant increase in cost for those options undermines their cost-effectiveness. The most optimistic incremental improvements in projected ridership amount to less than 3 additional BART riders per day -- at an additional cost in excess of \$50 million over the next most comparable alternative. Accordingly, BART is positioning itself to have to respond to inquiries by already skeptical funding authorities regarding the expenditure of more than \$15 million per daily passenger to increase ridership.

Response. This comment references Table 3.1-4, Alternative VI Aerial Design Option Regional Transit Person Trips Daily Volumes by Trip Purpose and Year, in the FRDEIR/S#2DEIS, as well as Table 3.1-14, (1992) Proposed Project Regional Transit Person Trips Daily Volumes by Trip Purpose and Year, and Table 3.1-66, Alternative VI Regional Transit Person Trips Daily Volumes by Trip Purpose and Year, both in the DEIR/Technical Appendix. Daily regional transit person trips, or linked trips, would increase by 23,200 trips under the Aerial Design Option LPA compared to the No Build Alternative in 2010, while these linked trips would increase by 22,200 trips under the 1992 LPA, and by 23,400 trips under the Alternative VI LPA, when compared to the No Build Alternative in 2010. The method used by the commentor to calculate the increase in projected ridership amount to less than three additional BART riders per day over the next most comparable alternative is unclear, but it appears that the 1,000-trip difference between the Aerial Design Option LPA and the 1992 LPA was divided by the number of days in the year. Actually the 1,000-trip difference between these two alternatives is daily linked trips and not annual trips. These numbers are not projections for BART riders but for transit person trips that discount transfers between different transit systems by counting any one transit trip as one transit person trip.

Please also refer to Response 16.49 for a discussion of other differences between the Aerial Design Option LPA and the 1992 LPA.

- 16.51. Finally, recent design options do not appear meaningfully to address transfer opportunities for transit riders south of SFIA. Options B and X fail to include a single convenient intermodal connection among BART, CalTrain, and the ALRS. CalTrain riders from San Mateo County and points south traveling to SFIA will be unable to transfer directly to the ALRS, which provides internal airport transportation not only to terminal areas, but also to remote employment sites at which thousands of individuals are employed. Instead, under Options B and X, CalTrain riders will be required first to transfer to BART and then to transfer to the ALRS at the SFIA BART station. Relying upon the construction of a separate CalTrain-ALRS transfer station to address this problem may simply make both projects susceptible to criticism on the grounds of wasteful duplication.

Response. The commentor's support for a single intermodal connection among BART, CalTrain, and the ALRS is noted. The 1992 LPA, TSM, Alternatives III, IV, V, and Design Options V-A and V-B under study in the DEIR/SDEIS provide an intermodal connection between CalTrain and the ALRS, either in San Bruno or Millbrae. Based on the environmental information in the DEIR/SDEIS, desire for direct BART service to the terminal area of the airport, and on a preliminary evaluation of comments received, the BART and SamTrans Boards of Directors selected Alternative VI as the Locally Preferred Alternative (LPA) on April 27 and April 28, 1995.

On June 21 and July 6, 1995, the BART and SamTrans boards directed staff to evaluate aerial design options to Alternative VI, as described Section 1.2, Purpose of this Report, in the FRDEIR/S#2DEIS. The FRDEIR/S#2DEIS for the BART-San Francisco Airport Extension was officially released for public comment on October 6, 1995. During the 45-day public comment period, approximately 70 letters were received from agencies, organizations, and individuals; 51 persons testified at the public hearing held on November 16, 1995. Based on the environmental information in the FRDEIR/S#2DEIS and on a preliminary evaluation of comments received, the BART and SamTrans boards modified the Alternative VI LPA, from south of Angus Avenue in San Bruno to the end of the tailtracks in Burlingame, to incorporate an aerial design option. This option, known as the Aerial Design Option LPA, was subsequently adopted by the boards on November 28 and 29, 1995. Alternative VI and the Aerial Design Option LPA are the only build alternatives which do not have a direct or CalTrain/ALRS connection. From the north, BART patrons would directly access the new Airport International Terminal under the Aerial Design Option LPA. From the south, CalTrain patrons would transfer to BART at the Millbrae BART/CalTrain Station to access the International Terminal.

MTC projects that all of the BART build alternatives would carry between 18,600 and 18,700 rail patrons to the airport. The Airport International Station under the Aerial Design Option LPA is

forecast by MTC to transport approximately 18,700 riders into and out of the San Francisco Airport, while from the external Airport Intermodal Station 18,700 riders will transfer to the ALRS to access the airport. Of the 18,700 riders to the International Airport Station, two-thirds would walk to their final destinations, compared to one-third that would transfer to the ALRS.

Under the Aerial Design Option LPA, MTC projects that approximately 13,300 passengers would arrive at the airport from the north and 5,200 would arrive from the south. Of the 5,200 patrons arriving from the south by CalTrain at the Millbrae Intermodal Station to ride BART into the airport, 3,300 would be air passengers and their greeters, and only 1,900 would be airport employees.

Approximately 75 percent of air passengers coming from the south would walk to terminals after exiting BART at the International Terminal Station, and only 25 percent would transfer to the ALRS before reaching their airport destination located beyond walking distance.

Of the 1,900 employees traveling from the south, approximately 1,200, or 63 percent, work at the United Airlines Maintenance Facility or other non-terminal locations, and approximately 700, or 37 percent, work at the terminals.

Of the 5,200 air passengers/greeters/workers coming from the south by CalTrain, transferring to BART, and continuing to the Airport, 35 percent, or approximately 1,900, would make a second transfer onto the ALRS, and 65 percent would walk to their airport destination once exiting BART. Approximately 10 percent of the total number of daily CalTrain and BART trips to the airport would be required to make a second transfer. This second transfer would be required for a relatively small percentage of the total CalTrain and BART trips to the airport.

In addition, please refer to Response 13.4 for discussion of the CalTrain-ALRS connection feasibility study.

- 16.52. Transfer opportunities are an important issue for the thousands of SFIA employees, as well as untold numbers of potential air passengers, who live south of SFIA and would be encouraged to use mass transit to the airport if better transfer opportunities were provided. The interests of greater transit usage in the San Francisco Bay Area, as well as maximizing transit trips to SFIA in particular, would be well served by devoting greater attention to the transfer and transit needs of residents south of SFIA.

Response. Please refer to Responses 4.9 and 6.10 for a discussion of ridership opportunities for the SFIA employees and residents living south of the airport.

- 16.53. The FRDEIR/S#2DEIS states that Options B and X will not have a disproportionate impact on high-minority neighborhoods. However, Options B and X would require relocation of 208 households, 97 percent of which would occur in one high-minority neighborhood. A comparison of these residential impacts with the construction and operational impacts of Options B and X suggests that these options may have disproportionate impact on high-minority neighborhoods. This conclusion is supported by the revisions to Chapter 7, "Environmental Justice," of the DEIR/SDEIS, issued on January 20, 1995, which acknowledged that Alternative VI would have a disproportionate impact on high-minority neighborhoods. Options B and X involve the same residential impacts as Alternative VI, and similar operational and construction impacts.

Response. Options B and X do involve the same residential impacts as Alternative VI and thus, may result in a disproportionate impact to high-minority neighborhoods. To reflect the revisions to Chapter 7 of the DEIR/SDEIS issued on January 20, 1995, the FRDEIR/S#2DEIS is revised on page 7-3, paragraph 10, sentences four and five, as follows:

Minority Neighborhoods. ~~Overall, it does not appear~~ that Alternative VI may ~~would~~ cause a disproportionate impact on high-minority neighborhoods because ~~Although~~ 97 percent of the displacements would occur in one minority neighborhood. This would appear to outweigh the fact that 67 percent of the neighborhoods bearing operational impacts and 83 percent of those incurring construction impacts would be mixed-populace neighborhoods.

Page 7-4, paragraph one is revised as follows:

The Aerial Design Option would require relocating the same 208 households. Operational impacts may occur in five ~~four~~ neighborhoods, only two ~~one~~ of which are ~~is~~ high-minority. Construction would cause impacts in 12 neighborhoods, two of them high-minority. ~~Overall, it does not appear~~ that the Aerial Design Option may ~~would~~ cause a disproportionate impact on high-minority neighborhoods because ~~Although~~ 97 percent of the displacements would occur in one high-minority neighborhood. This would appear to outweigh the fact that ~~60~~ 75 percent of the neighborhoods bearing operational impacts and 83 percent of those incurring construction impacts would be mixed-populace neighborhoods.

Please also refer to Response 6.81 for revised text for Section 7.4 of the FRDEIR/S#2DEIS.

- 16.54. Options B and X may be inconsistent with the mandate of Executive Order No. 12898 to avoid disproportionate impacts on high-minority neighborhoods. This inconsistency should be addressed in the Final EIR/EIS, in order to ensure that environmental justice concerns do not present a roadblock to the successful implementation of Option B or Option X. In addition, as discussed above, residential relocation costs associated with Options B and X should be carefully considered in the Final EIR/EIS.

Response. The President's Executive Order No. 12898, Section 1-101, mandates that "To the greatest extent practicable and permitted by law...each Federal Agency shall make achieving environmental justice part of its mission by identifying and assessing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations..." This requirement applies to all federal agencies (unless specifically exempted), but does not mandate that agencies must reach prescribed conclusions in their assessments or approve or reject projects based on such assessments.

As reflected in Response 16.53, Alternative VI may have disproportionate impacts on high-minority and low-income neighborhoods. Nonetheless, for the reasons explained above, this finding is not "inconsistent" with the Executive Order, nor does the Executive Order provide a "roadblock" as suggested by this comment.

Relocation costs are included in project costs and are presented in Table 6-1, on page 6-2 of the FRDEIR/S#2DEIS, as part of the "right-of-way" costs.

17. AMALGAMATED TRANSIT UNION LOCAL 192

- 17.1. The draft Environmental Impact Report fails to place this project in context and explain for the public what the risks are, and what the potential impacts are on various transit agencies and projects (i.e., CalTrain extension; CalTrain generally; SamTrans, and potentially every other transit property in the area).

Response. SamTrans is the co-sponsor of the project as well as the operator of San Mateo County bus service and CalTrain. Please refer to Response 6.67 for a discussion of SamTrans' capacity to support its portion of the project. Table 3.1-2, Daily Transit Operator Boardings, in the FRDEIR/S#2DEIS,

includes information on the forecasted ridership on CalTrain and SamTrans under the Aerial Design Option LPA and the changes compared to the No Build Alternative. Boardings on CalTrain increase by 8,900 and decrease by 2,800 on SamTrans under the Aerial Design Option LPA (LPA) compared to the No Build Alternative in 2010. Please also refer to Response 25.1 for a discussion of the impacts to CalTrain boardings, and to Response 6.14 for the impacts to SamTrans under the Aerial Design Option. The effects of the CalTrain downtown extension are presented in Response 6.8.

- 17.2. The BART proposal to spend over \$1 billion of public money, (during the worst transit funding crisis in 35 years), to carry a tiny fraction (4%-5%) of the daily traffic to and from the SF Airport is not in the public interest. Such spending compromises the ability of other transit agencies to maintain existing levels of service.

Response. Neither construction nor operation of the BART extension would affect funding for operations of any other transit agency. Capital costs would be covered principally by the Federal Transit Administration's (FTA) New Rail Starts (49 U.S.C. Section 5309) program funds, which cannot be applied to operations cost of any transit agency. Likewise, construction funds from the state, the SFIA, and West Bay bridge toll collections would not be applied to operations expenses of transit agencies. Please refer to Response 6.67 for a discussion of the capacity of SamTrans, the project's co-sponsor, to support its portion of the project.

Moreover, BART's operating funds are derived from ticket sales (approximately 48 percent) and from the portion of sales tax and property tax imposed on the residents of the three BART counties by the voters themselves. In fact, BART contributes approximately \$4 million per year to AC Transit, and additional funds to Muni. Therefore, operation of the extension would not compromise the operating funds of other transit agencies.

The BART extension is proposed to be constructed for several reasons, besides the reduction of traffic to and from the SFIA. The project would reduce existing congestion on Highway 101 and I-280; it would accommodate a portion of future travel demand in northern San Mateo County; it would accommodate a portion of travel demand at the SFIA associated with the projected 70 percent increase in passengers between 1990 and 2006; it would improve regional air quality by reducing vehicle miles traveled; and it responds to public mandate from San Mateo County voters, who approved ballot measures supporting the extension of BART into the county in 1985, 1987, and 1992.

- 17.3. The proposed extension depends upon cannibalizing SamTrans current bus riders and forcing the transfer of over half of CalTrain's ridership. In view of the high price tag, one would hope the extension would at least attract new ridership.

Response. Daily regional transit person trips, or linked trips, would increase by 23,200 trips under the Aerial Design Option LPA compared to the No Build Alternative in 2010. These linked trips would increase by 22,200 trips under the 1992 LPA and by 23,400 trips under the Alternative VI LPA when compared to the No Build Alternative in 2010. These linked trips are not projections for BART riders but for transit person trips that discount transfers between different transit systems by counting any one transit trip from origin to destination, no matter how many different transit systems, as one transit person trip. Linked trips are used to estimate the number of new transit riders that are being attracted onto transit vehicles.

- 17.4. Finally, BART is promoting the alternative that costs the most to operate and maintain. Alternative V-B costs \$6.8 million per year less in operation and maintenance. Over 20 years, the proposed system will cost approximately \$136,000,000 extra to operate and maintain. This factor alone is reason enough to prompt serious reconsideration of the project and compel BART to be more economical before public funds are committed...We urge you to reconsider in light of the current funding crisis and the impending and future needs of all transit agencies in the area.

Response. The LPA, as defined by the BART and SamTrans boards, is the Aerial Design Option, which has slightly reduced operations and maintenance costs compared to Alternative VI. Estimated operating and maintenance (O&M) costs for the Aerial Design Option are \$34.4 million in 2010 (in 1996 dollars). In accordance with the BART-SamTrans Comprehensive Agreement, SamTrans will cover the O&M costs of the extension and expects to have sufficient resources from fare revenues and surcharges. Please refer to Responses 6.67 and 6.72 for further discussion of SamTrans' capacity to support operations costs of the extension in San Mateo County.

18. COALITION FOR A ONE-STOP TERMINAL

- 18.1. We support economically sound, user-friendly mass transit options in the Bay Area. Our vision is of a one-stop intermodal terminal that connects CalTrain, BART and SamTrans to San Francisco Airport via an ALRS (ALRS). The one-stop concept would unify the transit agencies of the region while providing all Bay Area residents with equal access to convenient and affordable rapid transit to the airport.

Response. Please refer to Response 13.4 for a discussion of the possible CalTrain-Airport Light Rail System (ALRS) connection.

- 18.2. It is our firm belief that planned improvements to CalTrain, such as electrification and extension into downtown San Francisco, in combination with an ALRS airport link, is the most logical course of action.

Response. Please refer to Response 6.8 for a discussion of the CalTrain extension to downtown San Francisco. The commentor is referred to Responses 4.9 and 13.4 for discussion of the possible CalTrain-ALRS connection.

- 18.3. The DEIR/DEIS continues to present transit mode split projections to SFIA which are substantially below existing survey results...

Response. The commentor's concerns are addressed to the DEIR/SDEIS rather than to the FRDEIR/S#2DEIS. The commentor may be comparing Table 3.1-2, SFIA Airline Passenger and Employee Access Modes, Percent Distribution, to Table 3.1-67, Alternative VI Daily Trips by Mode to the SFIA. These two tables are not comparable because Table 3.1-2 is based on survey data while Table 3.1-67 reports the results of Metropolitan Transportation Commission (MTC) travel demand model. The correct comparison is to Table 3.1-22, Alternative I- No Build, Daily Trips by Mode to the SFIA, from which the 1993 transit work trip mode split to the SFIA is calculated to be 6.1 percent while the 1993 transit air passenger trip mode split to the SFIA is 12.0 percent. In Table 3.1-67, with the BART extension, the 2010 transit work trip mode split to SFIA is calculated to increase to 9.5 percent while the transit air passenger mode split is 17.0 percent.

- 18.4. Table 3.1-6 of the January DEIR/DEIS clearly presents transit ridership figures which indicate little difference between the TSM Alternative II and BART's Alternative VI to SFIA. Tables 3.1-8 in the January document and 3.1-5 in the Supplemental document present differing transit ridership numbers to SFIA, although generally in the same proportions. Table ES-2 of the Supplemental presents transit ridership figures in various alternatives which are widely at variance with both sets mentioned above.

Response. Table 3.1-6, Daily Trips by Mode to the SFIA, in the Summary DEIR/SDEIS and Table 3.1-8, Daily Trips by Mode to the SFIA, in the DEIR/Technical Appendix are the same exact tables in different volumes of the DEIR/SDEIS. Table 3.1-5, Alternative VI Aerial Design Option Daily Trips by Mode to the SFIA, in the FRDEIR/S#2DEIS presents the same type of information as in Table 3.1-6 of the Summary DEIR/SDEIS, but simply for Design Option B and Design Option X with changes from the No Build Alternative and the Alternative VI LPA also included. Table ES-2,

Comparison of Key Impacts, in the FRDEIR/S#2DEIS contains two types of BART patronage in 1998. The first is the increase in BART patronage in 1998, compared to the No Build Alternative in 1998 and the second is daily BART patronage in San Mateo County in 1998. Neither of these two types of patronage information can be compared to the information on daily trips by mode to the SFIA, including daily trips by BART to the SFIA because trips to the SFIA involve only one of many BART extension stations. Table ES-2, Comparison of Key Impacts, is a summary table that is not intended to contain all of the various types of patronage information.

- 18.5. As noted by C/CAG comments on the DEIR/DEIS, pages 6 and 12, the Costs Per New Rider presented by BART as improved by Option "X" (\$26.12) remain "Well above the range which FTA typically considers representative of relatively cost-effective, fixed guideway systems, i.e. \$5 to \$15 per new rider."

Response. Please refer to Response 6.76 for a discussion of the cost-effectiveness index for the BART extension.

- 18.6. Table 3.1-5 of the DEIR/DEIS asserts daily trips by mode which fly in the face of common sense. Well over half of SFIA's employees live south of the Airport, along a relatively narrow corridor. Yet, BART predicts it will carry well over two and two-thirds as many work trips daily as CalTrain. Other projections within this table are similarly unrealistic.

Response. The volumes of trips to the SFIA by mode in Table 3.1-5, Alternative VI Aerial Design Option Daily Trips by Mode to the SFIA, in the FRDEIR/S#2DEIS, are based on the MTC travel demand model, the regionally approved model for estimating mode choice volumes. Please refer to Response 6.10 for a discussion of the SFIA employees living south of the airport. Please refer to Response 4.9 for a discussion of connectivity for CalTrain riders accessing the SFIA.

- 18.7. The capital costs of Alternative II, the TSM alternative, are deliberately omitted from Table 2.3-1 of the January document. Why? Because they indicate that Alternative II is one-third the cost of Option "X", while Table 3.1-6 of the January document, combined with the lower ridership estimates of the Supplemental, indicates you get 90 percent of the transit ridership to SFIA for that one-third price.

Response. The capital costs of the TSM Alternative are estimated at \$247 million. Table 3.1-6, Transit Utilization by Geographic Area, in the DEIR/Technical Appendix, does not provide the change in total transit person trips, but rather contains transit person trips to the SFIA, northern San Mateo County, and downtown San Francisco. The increase in total transit person trips under the TSM Alternative in 2010 is 9,600 trips, and is 23,200 trips under the Aerial Design Option LPA (LPA). Transit person trips, or linked trips, discount the effect of transfers between transit systems, and the increase in linked trips only counts the number of new transit riders compared to the No Build Alternative.

- 18.8. As noted in the City of Millbrae Comment #6, BART has omitted any discussion of the cumulative freeway traffic impacts of the SFIA expansion combined with the BART extension.

Response. The cumulative impacts of the SFIA Master Plan were included in the DEIR/SDEIS. The travel demand model used to forecast transit patronage and traffic volumes was based on population and employment projections by the Association of Bay Area Governments (ABAG). Special attention was given to review these forecasts and compare their results to projections contained in the San Francisco International Airport EIR. Vehicle trips were added to the trip tables provided by the MTC to match the mid-range forecasts made in the SFIA Master Plan EIR. (Note: midrange was defined by averaging the high-end and low-end forecasts of vehicle trips.) Cumulative freeway traffic impacts under the Aerial Design Option LPA are addressed on pages 3.1-13 and 3.1-14 of the FRDEIR/S#2DEIS. In addition, the results in Table 3.1-93, Alternative VI Estimated Freeway Impacts Highway 101, of the DEIR/Technical Appendix also apply to the Aerial Design Option LPA.

- 18.9. It is extremely ironic that a mass transit project is causing serious traffic impacts (to LOS F) on a key traffic artery (Route 101).

Response. The increase in traffic volumes on Highway 101 south of the SFIA is affected by individuals who switch to Highway 101 to access a BART station. Under the Alternative VI LPA and the Aerial Design Option LPA, the BART extension would have cumulative traffic impacts on northbound Highway 101 south of the SFIA during the A.M. peak hour in 1998 by increasing traffic between 300 vehicles and 500 vehicles depending on the freeway segment, while during the P.M. peak hour in 1998 these two alternatives would have a significant impact by adding 100 vehicles in the southbound direction that degrades the level of service (LOS) from LOS E to LOS F. In the year 2010, similar cumulative traffic impacts result from the Alternative VI LPA and the Aerial Design Option LPA during the A.M. peak hour in the northbound direction south of the SFIA, as in 1998, while no significant impact occurs in the northbound direction during the P.M. peak hour in 2010 because the level of service is at LOS F under the No Build Alternative and only 100 vehicles are added by these two BART build alternatives.

- 18.10. Despite both verbal and written requests from elected officials and citizens groups, BART refuses to provide a cost breakout in the Supplemental document or for public information, of the Millbrae segments of the Wye. The cost of a "no-Millbrae" BART extension needs to be part of the public record.

Response. Please refer to Response 26.6 for a discussion of the costs of the south leg of the aerial wye.

- 18.11. To merely mention the study of the direct connection of CalTrain to the Airport's ALRS under "controversy" is insufficient. What is being withheld is the impact, negative on BART and positive on CalTrain ridership projections, that removing the forced transfer onto BART in order to access SFIA should have.

Response. Please refer to Response 4.9 for a discussion of connectivity between the ALRS and CalTrain. In addition, please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- 18.12. By industry standards, removal of the BART barrier to the airport should increase CalTrain ridership to the Airport by 50 percent.

Response. Industry standards cannot be applied to determine the exact change in patronage under a specific alternative because of the unique circumstance of any one alternative. Nevertheless, CalTrain ridership to the SFIA would increase if fewer transfers or improved travel time is provided. Please refer to Response 4.9 for further discussion of connectivity between the ALRS and CalTrain.

- 18.13. Transit ridership figures, cited previously (Table 3.1-6, January DEIR/DEIS) and extrapolated for BART patronage losses as cited in the Supplemental document, indicate that for over one billion dollars of public tax monies, the net difference in transit ridership to SFIA is 1,100 patrons.

Response. If one adds trips on BART, CalTrain and bus together in Table 3.1-6, Daily Trips by Mode to the SFIA, the result is 23,300 trips in 2010 and performs the same addition from Table 3.1-5, Alternative VI Aerial Design Option Daily Trips by Mode to the SFIA, for the Aerial Design Option X the result is 33,400 trips in 2010. The additional transit trips to the SFIA is just one addition in transit trips. Daily regional transit person trips, or linked trips, would increase by 23,200 trips under the Aerial Design Option LPA compared to the No Build Alternative in 2010. These linked trips are not projections for BART riders but for transit person trips that discount transfers between different transit systems by counting any one trip from origin to destination that uses transit, no matter how many

different transit systems, as one transit person trip. Linked trips are used to estimate the number of new transit riders that are being attracted onto transit vehicles.

- 18.14. The Supplemental DEIR/DEIS does not discuss the financial impacts of the 19,000 riders who will supposedly transfer from CalTrain to BART. How much fare revenue will CalTrain lose under BART's transfer scenario?

Response. Although not required for the purposes of NEPA or CEQA, Chapter 6 of the FRDEIR/S#2DEIS provides the public and decision makers with estimated capital, operations and maintenance costs, and other financial information. Further financial information regarding fares and revenue estimates will be made public as soon as it is completed. Please also refer to Response 16.1 for a discussion of potential impacts to transit agencies, and Response 22.8 for a discussion of specific effects to CalTrain.

- 18.15. The BART environmental documents do not discuss the financial impacts of taking over the backbone of SamTrans service, commute routes into San Francisco. SamTrans commute routes 7B, 7F and 5M carried an average of 19,600 passengers each weekday during September, 1995... a full one-third of all SamTrans patrons. While not all of these patrons go all the way into San Francisco, the higher commute fares constitute SamTrans' most reliable and substantial fare revenues. The downtown San Francisco portions of these lines would be abandoned as redundant once BART is functional.

Response. Please refer to Response 32.35 for a discussion of SamTrans bus service.

- 18.16. The words "van shuttle" barely appear in BART's documents, yet by survey 18.7 percent of all SFIA air passengers utilize van shuttles. This on-call public transit service would also be usurped by BART, shifting but not creating new transit users. BART does not discuss how many shuttle patrons would shift to BART.

Response. On-call van shuttles were incorporated into the auto category in estimates of mode choice. For example, in Table 3.1-5, Alternative VI Aerial Design Option Daily Trips by Mode to SFIA, in the FRDEIR/S#2DEIS, the auto category includes taxis as well as private automobiles. Van shuttles were not included as a separate category in MTC's travel demand model, so specific patronage estimates for this type of vehicle cannot be provided. Please also refer to Response 25.7 for a discussion of van shuttle service to SFIA.

- 18.17. BART does not discuss the surcharge levels necessary in San Mateo county to support BART operations. The minimum percentage mentioned by SamTrans staff is 65 percent. In other words, a BART trip which costs under one dollar elsewhere would cost \$1.65 in San Mateo. What impact would this extreme surcharge have on BART and other transit patronage, in light of BART's ridiculous claim that its San Mateo line will break even at the farebox?

Response. Please refer to Response 6.71 for a discussion of operating costs for the BART extension. Please refer to Responses 9.19 and 9.20 for a discussion of surcharge assumptions used in modeling patronage.

- 18.18. Crucial to the capital and operating funding of BART is the capacity of its local partner, SamTrans, to support BART without bankrupting its local bus and rail services. BART is precluded by state law from investing any of its monies in the SFIA Extension. Yet, it does not discuss the financial capacity of SamTrans.

Response. Please refer to Response 6.67 for a discussion of SamTrans' capacity to support the project.

- 18.19. One crucial question is the unrealistic financial plan presented by SamTrans staff, in order to fund BART. Sales tax funds are the single largest revenue source for SamTrans. The increase in sales tax revenues last year was barely 2 percent. While the Federal Reserve Bank projects 3 percent growth in local sales tax revenues, SamTrans projects an unrealistic 5 percent annual increase in sales tax revenues to the year 2010. If sales tax revenues average an increase of 3 percent over the next 10 years, an ambitious assumption, SamTrans will have accumulated 10-year shortfalls in revenues of over \$52 million!

Response. Please refer to Response 6.67 for a discussion of SamTrans' capacity to support the project.

- 18.20. The cumulative impacts of these dire financial signals, which BART neglects to discuss in its environmental documents, spell severe financial problems for SamTrans. Consider the cumulative impact of (a) sharply lowered farebox revenues as BART captures SamTrans riders, (b) revenue shortfalls from unrealistically high sales tax projections, (c) further lowering of farebox revenues due to high surcharges, (d) the rapid and continued loss of federal operating subsidies, and (e) state transportation funding shortfalls.

Response. (a) SamTrans isn't worried about BART capturing its bus ridership, it is counting on it and has designed promotional programs to encourage it. SamTrans' financial plan anticipates route renovations which will modify inefficient or duplicative bus service. Although the current bus service is highly productive, it is still subsidized. Elimination or modification of the duplicative routes will save more in expenditure than may be lost in passenger fares, resulting in a positive net impacts.

(b) The SamTrans financial plan includes an assumption that sales tax will grow at the rate of inflation plus one-half of one percent. Since 1985, San Mateo County sales tax has grown at a ratio slightly greater than inflation plus population growth, slightly out-performing during the 1980s and under-performing during the 1990's. The SamTrans financial plan includes an inflation assumption of 3 percent. The sales tax revenues is projected to achieve a rate of growth of 3.5 percent, which is a real growth rate of one-half of one percent, and relates to the projected change in population. For the period 1995 to 2010, the projected annual growth in San Mateo County population has been estimated by the following sources:

Woods and Poole Economics, Inc.	0.55%
California Department of Finance	0.60%
Center for the Continuing Study of California Economy	0.65%

(c) The patronage estimates include the assumption that the surcharge will be imposed at the same rate as Daly City. Therefore, the ridership and revenue projections already include the impacts of the proposed surcharge. Further, the ridership and revenue projections include an assumption that the surcharge amount will escalate at the same rate as the BART basic fare.

(d) The SamTrans FY 1995-96 to FY 2004-05 Short Range Transit Plan does in fact reflect optimistic revenue estimates for Federal Operating Assistance. For the ten year period covered by the SRTP, SamTrans has projected that it will receive \$10.5 million. The projected expenditures during the same period amount to \$1,365 billion. The elimination of all Federal Operating Assistance, although not desirable, will not have a noticeable impact on SamTrans' financial condition.

(e) Elimination of state transportation funding would have a devastating impact on not only SamTrans, but also all transit in the state. The specter of this may never be permanently removed, but it did diminish significantly with the recent demise of the Richter bill. (AB 2084).

SamTrans does not anticipate having to subsidize the BART extension at all, with fares and anticipated surcharges more than covering operations costs assigned to SamTrans. Please see also Response 6.71 for a discussion of SamTrans' collection of fares and surcharges.

- 18.21. Once again, the cost effectiveness index cited in the C/CAG comments indicates that BART is from twice to five times as high as maximum indices usually acceptable to FTA.

Response. Please refer to Response 6.76 for a discussion of the cost-effectiveness index for the project.

- 18.22. The Alternative II capital costs are one-third of Option "X," meanwhile delivering 90 percent of the transit ridership to SFIA, by BART's own figures. Alternative 5B has a capital cost of several hundred millions of dollars less, meanwhile delivering essentially the same transit ridership.

Response. As discussed in the DEIR/SDEIS on pages 1-1 through 1-5 and the FRDEIR/S#2DEIS on pages 1-1 through 1-6, all proposed project alternatives have been extensively analyzed. The Aerial Design Option was selected as the new LPA based upon public comment and considerations of transit ridership, service to SFIA and San Mateo County, environmental impacts and federal funding requirements. The FRDEIR/S#2DEIS on page 1-6 identifies the three key reasons for the project as: to alleviate highway congestion, to improve air quality and to carry out the public mandate of the San Mateo County voters.

Please see Response 17.2 for a discussion of public benefits of the project in general, Response 32.7 for a discussion of transit boardings, and Response 18.13 for further discussion of comparisons of transit trips to SFIA.

- 18.23. The comparison of Alternative II operating costs versus Option "X" operating costs has likewise been omitted. Option "X" annual operating costs are estimated by BART at \$308.2 million per year, while the Alternative II operating costs are estimated at \$250.6 million annually...a difference of \$57.6 million. Over 20 years, Alternative II saves \$1.15 billion in operating costs.

Response. The operating costs of the TSM Alternative is not provided in the environmental documents because BART is not one of the agencies providing these operating costs. Decisions on the TSM projects will be made entirely independently of the BART-San Francisco Airport Extension decisions.

Option "X" annual operating costs are not shown to be \$308.2 million per year. This is the cost of operating the entire BART system, including the extensions to Pittsburg, Pleasanton, and Millbrae, in 2010. The estimated cost of operating Option "X" from south of Colma to Millbrae is shown to be \$34.4 million in 2010 in Table 6-2 of the Summary DEIR/DEIS and the DEIR/Technical Appendix. Please refer to Response 6.71 for a discussion of SamTrans' capacity to cover the operating costs of the extension.

- 18.24. Table 6.7 of the Supplemental document is yet another example of BART deliberately omitting Alternative II information (claiming it is "n.a.") so that BART's alternatives will look better by comparison.

Response. The first and least expensive alternative analyzed in Table 6-7 of the FRDEIR/S#2DEIS is Alternative II. The first row under columns 2, 4, 7, and 8 are "n.a." (not applicable) because the comparison of the TSM against itself is unnecessary; there would be no "Change from TSM." Similarly, column 5 is "n.a." because the TSM would not result in "Annual Transit Time Savings" since Table 6-7 uses the TSM as the base from which the fiscal outcomes of the other project alternatives are compared.

- 18.25. BART, as all public transit systems, will only recover a fraction of its costs via farebox revenue. SamTrans is responsible for covering operating deficits. Where will the funds come from to cover operating deficits? When will BART begin discussing these issues as part of its financial analysis?

Response. Please refer to Response 6.71 for a discussion of operating costs of the BART extension.

- 18.26. There are significant costs omitted from BART capital cost estimates. First, it is BART's intention to finance through borrowing the one billion dollars for construction. What are the costs, to the nearest tens of millions of dollars, of this financing? This is another question which BART staff refuses to answer.

Response. Please refer to Response 6.75 for a discussion of the amount of financial information provided in the financial plan.

- 18.27. The San Francisco International Airport has committed \$120 million of its expansion to traffic mitigation measures, via a Memorandum of Understanding with C/CAG. BART, on the other hand, refuses to even estimate appropriate mitigation costs. It prefers to identify serious environmental impacts then offer to pay a "fair share" of the costs. Use of the phrase "fair share" is disingenuous, to say the least, given the massive environmental impacts generated by BART.

Response. All environmental impacts associated with the proposed project alternatives have been identified and appropriate mitigation measures proposed. Conceptual mitigation cost estimates are included in the capital cost estimates provided in Table 6-1 of the environmental documents. BART intends to pay for any mitigation associated with an identified impact attributable solely to the proposed project. Where several parties are jointly responsible for the identified impact and proposed mitigation, as in the commentor's example, BART intends to pay its fair share of the cost of mitigation. Please refer to Response 16.7 for a discussion of mitigation costs and the line items that contain them. Please see Response 7.4 for an example of fair share contributions.

- 18.28. Between the financing and mitigation costs, it is very likely that the supposed \$200 million savings generated by Option "X" will disappear. It is the responsibility of BART to provide honest and complete cost figures to the public.

Response. Please refer to Responses 6.67 and 16.3 for a discussion of the financial information required in an environmental document.

19. COALITION OF COLMA CEMETERIES

The geographic study area of the FRDEIR/S#2DEIS is the BART-San Francisco Airport Extension project corridor south of Agnus Avenue in San Bruno. Many of the commentor's concerns deal with a portion of the alignment not addressed by this document.

- 19.1. We find that the Utilities Report as written, has left out many significant utility concerns....We hope to work closely with BATC staff and BART engineers in making sure that these concerns are carefully addressed and resolved in the final EIR.

Response. The geographic study area of the FRDEIR/S#2DEIS is the BART-San Francisco Airport Extension project corridor, beginning south of Angus Avenue in San Bruno and continuing to Burlingame. The commentor's concern deals with a portion of the alignment not addressed by this document. However, the impacts discussed in the subject report and proposed mitigation are being addressed in the geotechnical, utility, and other reports, and are topics of discussion in ongoing meetings between the Coalition of Colma Cemeteries and BART. Please refer to Response 19.5 for a description of agreements being negotiated with the cemeteries.

- 19.2. The unit of vibration measurement is not defined anywhere in the report. The instrumentation used to measure ambient groundborne vibration levels is not discussed.

Response. Ground vibration units are root-mean-squared (RMS) velocity in dB 10^{-6} inches/second, which is standard for the transit industry. Accelerometers were used to measure the ground vibration and were adhered with scientific wax to the sidewalk or to the top of a specialized spike driven into the ground. The acceleration data was fed into an integrator, from which the velocity levels were obtained.

- 19.3. The BATC report ["LPA-Segment No. 1 - Utilities Relocation Report, May 1994"] serves as an initial document for the utility relocation plans impacted by the proposed BART extension and does not contain any specific details for relocation and/or replacing any of the existing utilities....The Coalition [of Colma Cemeteries] should become involved with the planning and design of any utility work regarding timing, type of pipe or conduit, location, and method of installation of the infrastructure. Special note should be given to Section One, entitled "Common Concerns", in the "Impacts on Existing Facilities" report (CSW/St2, 1992). These 10 items should be included in any negotiations with BART to ensure future operation of the Coalition's infrastructure.

Response. Please refer to Response 19.1 for a discussion of utilities at or near the Colma cemeteries.

- 19.4. Cypress Lawn Cemetery would like to discuss the location of th[e] ventilation facility with BART/BATC engineers. Cypress Lawn would also like to make sure that potential impact to the Cypress Lawn environment posed by this structure be studied. Cypress Lawn would like to reserve the right to revisit this issue pending EIR results.

Response. Specific location details of the ventilation structures will be developed during preliminary design and will be coordinated with Cypress Lawn Cemetery.

- 19.5. In the Final EIR it must be made clear that BART, and not the cemeteries is responsible for any and all costs associated with the coordination, design and construction and other costs involved with all relocations and/or modification of utilities.

Response. BART and SamTrans have entered into discussion with the cemeteries, as well as with all affected utility providers, regarding construction impacts and utility relocation and modifications. The agreements will cover costs of coordination, design, construction, and utility relocation and modification.

- 19.6. Methodology (page 3.9-15):...In order to review this study, we need to know which empirical models were used, which data from the existing BART system were used, and what the "appropriate adjustments" for anticipated local soil conditions were. There is simply no information included to allow one to track the analyses.

Response. The empirical models used to predict groundborne noise and vibration levels for cemetery buildings were based on measurements of vibration from BART trains in nearby Daly City, with adjustments for building response, based on data collected by the proposed project sponsor's consultant over the last 30 years. Subsequent to these predictions, soil propagation tests, using boreholes drilled in Colma in soil strata similar to those in the area of the cemeteries, have been performed as part of preliminary engineering investigations. The dominant geologic strata in the area of the cemeteries are referred to as Colma Formation, a somewhat stiff sandstone. These later data will be used to make more accurate predictions using a model developed for the U.S. Department of Transportation. The model is in Nelson and Saurenman, "A Prediction for Rail Transportation Groundborne Noise and Vibration," Transportation Research Board, AF104, January 1987.

- 19.7. The Coalition [of Colma Cemeteries] and BART should also determine and agree, prior to any work being performed, to the party or parties responsible for costs associated with design and construction of any utility modifications or relocations. Also, the Coalition should receive assurances that any interruptions in utility service will be of a time frame acceptable to the individual cemeteries affected.

Response. Please refer to Response 19.5 for a discussion of utility agreements with the cemeteries.

- 19.8. We also have concerns about the technical appendix on Noise and Vibration....The report is woefully lacking in concrete information. The report does little more than gloss over concrete proposals for mitigating the many problems we face at our cemeteries....The many problems our structures and businesses could face in the areas of ground and airborne vibration and noise [must] be carefully addressed in the final EIR.

Response. Details for specific mitigation measures would be determined during the final engineering phase of this project. Potential impacts and possible mitigation measures have been identified, as appropriate for this level of analysis, in Chapter 3, Section 9 of the FEIR/FEIS.

- 19.9. How accurate are the Noise and vibration level predictions?...It is not possible to logically track any information through the document in order to independently determine whether or these predictions are even in the ballpark. It is, therefore, impossible to know whether or not the mitigation measures discussed are necessary or adequate.

Response. The prediction of groundborne noise and vibration was based on the data available at the time the analysis was performed. Predictions using measured groundborne vibration from BART in Daly City were used for the entire alignment. Subsequently, preliminary engineering studies in the Colma and South San Francisco areas of the proposed alignment have produced additional data concerning soil vibration characteristics in those areas. These data, as discussed in Response 19.6, will be included in the final analysis for sensitive buildings in the cemetery areas.

- 19.10. Included with this review [of the Utilities Relocation Report are]: A. Utility Inventory List (1994 BTAC/1992 CSW/S12). B. Common Concerns (1992, CSW/S12). [Please review and comment on these attachments...].BATC, be sure to review attachments to Comment 50B.3.

Response. Please refer to Response 19.1 for a discussion of the Utility Report.

- 19.11. The mitigation measures for groundborne noise and vibration are discussed on pages 3.9-19 and 3.9-20. The introductory statement says "Implementation of the following measures in the locations identified would reduce the impacts to an insignificant level." There is no supporting evidence for this statement....There is no information as to the decibel reduction expected from the implementation of any of the three mitigation measures identified in the report...

Response. Each measure presented for mitigation of groundborne noise and/or vibration is discussed in detail in the DEIR/Technical Appendix (see pages 3.9-19 and 3.19-20). Floating slab trackbed can be designed to sufficiently reduce vibration in essentially any situation encountered by heavy (and light) rail transit systems, based on 30 years of experience of the proposed project sponsor's consultants. The amount of noise and vibration reduction expected from either resilient ties or soft rail fasteners is indicated in the text. The third mitigation measure (offsite) would not be feasible for buildings in the cemetery primarily because of their shear bulk.

- 19.12. BART should complete a thorough and accurate analysis of the predicted groundborne noise and vibration levels and an analysis of the effectiveness and appropriateness of mitigation measures during the preliminary design phase. This study would demonstrate how compliance with the groundborne noise and vibration criteria in Tables 3.9-4 and 3.9-5 of the DEIR will be achieved....A condition of approval for this project should require the preparation of this report and its submittal for review and

approval to the cemeteries. Progress reports should be submitted to the cemeteries for review and comment....The report should contain at a minimum quantitative predictions of groundborne noise and vibration levels at each potentially affected sensitive receptor which include predicted source levels, the predicted propagation rate through the ground, predictions of coupling between the ground and the structures, and predicted attenuation or amplification of the building structures themselves. Actual transfer functions should be determined through the use of vibratory sources and actual onsite monitoring, if possible. The unmitigated levels should be compared to the groundborne noise and vibration thresholds. The mitigated levels should be provided for the various mitigation alternatives. The bases for decisions regarding which mitigation measures are eventually selected should be clearly described in the report.

Response. The geographic study area of the FRDEIR/S#2DEIS is the BART–San Francisco Airport Extension project corridor south of Angus Avenue in San Bruno. The comment deals with a portion of the alignment not addressed by this document. The comment is, however, noted.

Decisions on which specific mitigation measure to use for each impacted area will be made in the preliminary engineering phase of the project. More detailed information on the planned alignment will be available during that phase, whereas only general data are available during the environmental process. Prior to the engineering phase of the project, it is not feasible to engineer specific mitigations for all of the alternatives studied. Consistent with the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), areas of the community which are sensitive to noise and/or vibration have been identified, and feasible mitigation measures provided for each of the significant impacts, in the DEIR/SDEIS and the FRDEIR/S#2DEIS. In the preliminary engineering phase, the alignment is studied in detail and additional tests are performed to make more accurate predictions of groundborne noise and vibration, including soil vibration characteristics tests, as mentioned in Response 19.6. Predicted levels of groundborne noise and vibration are made for each of the buildings or groups of buildings identified in the environmental process. Mitigation measures provided in the DEIR/Technical Appendix (page 3.9-19) are carefully evaluated to determine which means of noise and vibration control would keep levels consistent with the criteria indicated in Tables 3.9-3, 3.9-4, and 3.9-5 of the Technical Appendix.

- 19.13. The right column headings for “Special-Function Buildings and Outdoor Areas” criteria are reversed in Tables 3.9-4 and 3.9-5.

Response. The commentor is correct. The right column heading in Tables 3.9-4 and 3.9-5 is corrected from “Vibrations” to “Noise” and from “Noise Levels (dBA)” to “Vibration Levels (dB)” in Table 3.9-5. In the footnote to Table 3.9-4, “Research Library” is changed to “Research Libraries.” In addition, “dBA” is changed to “dB” in Table 3.9-5. The last listing and footnote in Table 3.9-5 is to read “Research Laboratory.”

- 19.14. BART should prepare, as a condition of approval for this project, a detailed noise and vibration monitoring program which outlines how groundborne noise and vibration levels will be monitored after operation begins. At a minimum, the program should specify the numbers and types of measurements which will be conducted in order to provide a statistically valid representation of the groundborne noise and vibration levels, the requirements for types of measurements which would be made and the credentials of the personnel who would be conducting these studies, and the timing of the study. The program should also identify the procedures which would be followed if monitored noise and vibration levels are found to exceed the allowable levels. The results of the noise and vibration monitoring reports must also be subject to review by the cemeteries.

Response. BART will provide the representative of the cemeteries with results of the engineering studies of groundborne noise and vibration that would affect cemetery property. Under current CEQA regulations, implementation of environmental mitigation will be monitored for both construction and operational impacts. Construction noise and vibration impacts will be controlled, as discussed in the

DEIR/SDEIS, using widely accepted noise and vibration limits. As indicated in the DEIR/Technical Appendix (see page 3.13-163), the cemeteries, because of their sensitive nature, will be considered "special zones." BART will work with the representative of the cemeteries to develop appropriate noise and vibration limits and evaluate possible restrictions on construction times, in cases where the limits identified in Tables 3.13-11, 3.13-12, 3.13-14 are not adequate to avoid unnecessary disruption to cemeteries.

- 19.15. Transient noise occurs during train passbys and this noise is transmitted from vent shaft openings. Traction power substation and fan noise is characterized as continuous ancillary equipment noise. Neither of these noise sources are discussed in the Colma section of the DEIR/Technical Appendix. Specific predictions of noise levels resulting from the proposed ventilation building and shafts should be provided and compared to the appropriate criteria....This level of analysis should be included in the EIR, at least at a screening level of detail.

Response. The geographic study area of the FRDEIR/S#2DEIS is the BART–San Francisco Airport Extension project corridor south of Angus Avenue in San Bruno. The comment deals with a portion of the alignment not addressed by this document. The comment is, however, noted.

In the cemetery area of Colma, there would be a ventilation shaft approximately 150 feet south of Serramonte Boulevard. A train control bungalow and ventilation shaft would be located approximately 800 feet south of the Cypress Lawn Cemetery driveway.

Adherence to BART Ancillary Design Criteria would reduce noise from BART vent shafts in the cemetery area to below a level of significance. Noise from the BART vent shafts along the subway alignment in the cemetery area would be 60 A-weighted decibels (dBA) or less at a distance of 50 feet. The applicable design criteria for noise from transit ancillary facilities for the cemetery area in Colma is "average residential." In average residential neighborhoods, the BART design criteria limit these transient noise levels to 55 dBA at 50 feet. Reduction of noise from these sources to achieve design criteria compliance would be achieved through vent shaft design and application of sound absorption materials, as necessary. The design for noise control measures would be prepared during preliminary engineering phases of the project.

The traction power substation is an "ancillary facility" and would be designed to the appropriate noise criterion contained in BART's system design criteria; the noise impact would be insignificant after application of BART's noise criteria. Please refer to the DEIR/Technical Appendix, page 3.9-14, for additional details.

In the cemetery areas, there would be two ventilation buildings identified in the proposed alternatives. One would be located just south of Serramonte Boulevard, 300 feet away from the ventilation shaft. The second proposed ventilation structure would be within the alignment segment, in Holy Cross Cemetery, south of the pond. The closest affected area of the cemetery would be approximately 100 feet from the vent shaft. Fans in the ventilation structures are only used in an emergency or for routine maintenance, once or twice a year at most. Typical noise levels expected from train passby noise are less than 75 dBA at 25 feet from the vent shaft without mitigation. At 100 feet from the vent shaft, the train passby noise should be less than 63 dBA. The vent shafts in the cemetery would be designed to limit train noise emitted from the shafts to a maximum of 55 dBA. Mitigation would include silencers and lining of ventilation ducting to the ground surface.

- 19.16. A subsequent detailed study should be conducted as outlined above for the vibration and groundborne noise. This study would demonstrate how compliance with the noise criteria in Table 3.9-3 of the DEIR will be achieved. BART should include the airborne noise study as a part of the design studies outlined above and should describe the noise monitoring program. Noise measurements should be conducted after operations begins and the results should be documented as outlined above. Progress reports should be submitted to the cemeteries for review and comment.

Response. The geographic study area of the FRDEIR/S#2DEIS is the BART–San Francisco Airport Extension project corridor south of Angus Avenue in San Bruno. The commentor’s concerns deals with a portion of the alignment not addressed by this document. However, for a response to this comment, please refer to Response 19.12 for a discussion of noise and vibration impacts and mitigations to the cemeteries in Colma.

20. COUNTY COUNCIL LEAGUES OF WOMEN VOTERS OF SAN MATEO COUNTY

- 20.1. The report predicts that only 10% of CalTrain riders will transfer to BART at Millbrae to go into the SFIA and perhaps 50% will transfer to BART to travel northbound. Since approximately 2/3 of the SFIA employees live south of the SFIA, and travel to work five days a week, and because SFIA has committed itself to an aggressive program to educate employees to use transit options, it would seem that a link between the ALRS and CalTrain should serve more than 10% of future CalTrain passengers, even if that many do not presently use CalTrain.

Response. Please refer to Response 6.10 for a discussion of SFIA employees living south of the airport. Please refer to Response 4.9 for a discussion of connectivity for CalTrain riders accessing the SFIA.

- 20.2. CCAG’s new Travel Demand Model is capable of assessing travel pattern predictions for BART service, with and without the CalTrain downtown extension. The Model needs to be run before the decision process proceeds further, because ridership is an important factor not only in cost effectiveness estimates for BART extensions, but also for the potential changes in traffic congestion and air quality in the study area.

Response. Please refer to Response 6.25 for a discussion of the City of County Association of Governments of San Mateo (C/CAG) travel demand model.

- 20.3. This FEIR also tells us (page 6-11 and Table 6-6) that traffic LOS will worsen at intersections in the area as a result of this project, presumably a trade-off for the regional benefit of fewer cars on the roads although creating a significant negative local impact. The Millbrae Avenue site plan, which these plans would partially accommodate, is an essential feature in the mitigation of traffic impacts for the end of line station and parking proposed for this alternative. BART should present its calculations showing costs as well as traffic impacts involved to completely integrate the Millbrae plan in its planning. Appendix Table B, Intersection LOS, needs to define its measurement standard. Do the traffic counts represent actual counts, or has the regional (pass-through) traffic been subtracted from actual counts, as allowed for CMP counts?

Response. After review of the City of Millbrae’s comments, which included their Concept Plan, the design of the Millbrae Avenue Station was modified and does reflect comments received by the City of Millbrae and parts of the Millbrae Avenue Station Concept Plan. The traffic volumes forecast under each of the alternatives studied in the FRDEIR/S#2DEIS and the DEIR/SDEIS are the total traffic volumes including any regional (pass-through) traffic. Please refer to Responses 6.21 and 6.22 for a discussion of the El Camino Real/Millbrae Avenue intersection.

- 20.4. Significant traffic impacts will be caused by Alternative VI and its Options B and X. In fact, changes in the circulation system proposed for exiting the Millbrae Avenue station would increase traffic volume at the Broadway/101 interchange, and will have significant negative impacts at the El Camino Real/Millbrae Avenue intersection in spite of the overpass project presently under construction. BART’s proposal to add one eastbound lane to the overpass by retrofitting this project is impractical because the overpass project will have advanced too far before the BART project receives the necessary approvals and funding. BART’s proposal to make Fair Share Contributions to interchange and roadway improvements in the impacted area may be a reasonable mitigation for some impacts if the other parties involved can come to agreement with BART regarding cost allocations.

Response. The BART extension under the Alternative VI Locally Preferred Alternative (LPA) would have minimal impact on the Broadway interchange with Highway 101. The subarea traffic model indicated that in the area of the Broadway interchange, the net change in traffic movements under the Alternative VI LPA and the Aerial Design Option LPA would be primarily northbound and southbound trips on Rollins Road, with approximately 120 vehicles northbound crossing Broadway in the A.M. peak hour and 50 vehicles southbound crossing Broadway in the P.M. peak hour in 2010. The model also revealed that BART-oriented vehicles on Highway 101 would stay on the freeway near the Broadway interchange and exit the freeway at the Millbrae interchange.

The suggested addition of an eastbound lane on Millbrae Avenue between El Camino Real and Rollins Road would improve the level of service at the intersection of El Camino Real and Millbrae Avenue to acceptable levels under the Alternative VI LPA or the Aerial Design Option LPA. Even though this improvement would require retrofitting the Millbrae Avenue overpass to the CalTrain tracks, the addition of one traffic lane is still practical. The contribution made to the City of Millbrae for improving traffic operations at the El Camino Real and Millbrae intersection would be based on the addition of an eastbound lane. The City of Millbrae, as the lead agency in making this improvement, may decide to pursue a different improvement. Please also refer to Responses 6.21, 6.24 and 7.4 for further discussion of BART's fair share contribution to level of service and intersection upgrades.

- 20.5. On page 3.1-14, BART states that "with the CalTrain downtown extension added to the Aerial Design Option, no additional significant cumulative impacts to local intersections would occur."...BART's recognition of the value of the CalTrain extension as a means to reduce congestion needs to be extended to a recognition that the CalTrain downtown extension is, by itself, a viable means of providing the needed peninsula link in the regional transit network, when linked to BART at truly intermodal stations, as defined in the 1992 AA/DEIS/DEIR. Unfortunately, the current DEIR/DEIS proposes direct links for BART/CalTrain and for BART/ALRS, but no truly intermodal link for BART, CalTrain, and the ALRS.

Response. The commentor is correct in that the Aerial Design Option LPA provides for a BART/CalTrain and a BART/ALRS connection. The CalTrain/Airport Light Rail System (ALRS) connection would be indirectly provided by BART, as CalTrain riders wishing to reach destinations at the SFIA would need to transfer to BART at the Millbrae Avenue Station and then to the ALRS at the Airport International Terminal Station. CalTrain by itself is a valuable contributor to serving the transit needs along the Peninsula. However, both BART and CalTrain are necessary and desirable. Please refer to Responses 23.8, 23.10, and 32.72 regarding the importance of both systems.

- 20.6. This FEIR/SDEIS does not adequately address concerns regarding spillover parking near BART stations, especially the end-of-line station. Use of parking meters and restricted zones, the only proposed mitigation, would place a burden on local residents and create an expense for local governments to implement the mitigation, which BART would not pay for.

Response. Please refer to Responses 6.26 and 6.27 for a discussion of monitoring spillover parking and the various programs to reduce this impact.

- 20.7. Intermodal transfer arrangements are not well defined for CalTrain passengers who want to use the proposed BART shuttle from Millbrae to SFIA, and how to distinguish these BART riders from those who might park at the Millbrae Avenue station to travel to SFIA. Likewise, there is no discussion of arrangements for those passengers traveling from north of SFIA who would transfer to CalTrain to travel south of SFIA. Since more than half of CalTrain passengers are expected to transfer to one of the BART options available at Millbrae, it is imperative to have efficient access between the two rail systems in both directions.

Response. Considerable attention has been given to various designs for cross-platform transfers between BART and CalTrain. The design of the platforms for the Millbrae Avenue Station in the

FRDEIR/S#2DEIS includes a platform that would serve cross-platform transfers between BART and CalTrain. This platform would primarily serve the transfer between CalTrain and the BART train going to SFIA from the Millbrae Avenue Station. However, this platform would serve CalTrain patrons transferring to BART destined for the Tanforan Station, and north to San Francisco and beyond, during the A.M. peak period. The platform could serve BART patrons transferring to southbound CalTrain trains, if CalTrain reroutes the southbound trains to the track serving this platform.

The cross-platform feature at Millbrae Station would provide for same-level transfers between northbound CalTrain trains and northbound BART trains to the City as well as the shuttle to the Airport.

Parking policies to be developed by SamTrans and BART would provide the necessary mechanisms to discourage any overnight or long-term parking at the Millbrae Station garage for patrons going to the Airport. Please also refer to Response 9.9 for further discussion of parking management at the Millbrae Avenue Station.

- 20.8. Construction will also cause negative impacts on the CalTrain commute service, due to slowdowns in construction areas (up to four years to construct the project) adjacent to or on CalTrain right-of-way on the main line and at the intermodal stations. This extended impact could materially affect CalTrain's revenues and operations.

Response. Please refer to Response 9.4 for a discussion of speed reduction impacts to CalTrain service during construction of the BART extension. Although the project will require four years to construct, the impacts on CalTrain would be restricted to geographic areas, as described in Response 9.1

- 20.9. BART has not yet made any agreement for use of the CalTrain right-of-way; BART assumes the necessary agreements and/or easements will be forthcoming.

Response. The commentor is correct in that BART has not entered into agreements with the Peninsula Corridor Joint Powers Board (JPB) regarding use of CalTrain right-of-way. However, per terms of the BART-SamTrans Comprehensive Agreement, March 1990, SamTrans is required to purchase all necessary property for the BART-San Francisco Airport Extension project. Because BART, SamTrans, and CalTrain are cooperating transportation agencies, agreements regarding right-of-way utilization and impact to facilities would be addressed in a comprehensive agreement.

- 20.10. All costs attributable to the project must be borne by BART, including advance notice to CalTrain patrons about unusual construction-related delays necessitated by construction.

Response. BART will coordinate with CalTrain with regard to all construction that would influence CalTrain operations. Every effort will be made to minimize impacts on CalTrain riders. The project will pay all costs to mitigate the impacts on JPB and CalTrain operations.

- 20.11. Mitigation Measure 1.3 (pages 3.7-4, -5) proposes to convert the community garden area and lands east of the PG&E Substation, upland sites, into wetlands, creating impacts to the current uses of those properties. No replacement has been identified.

Response. Wetland impacts must be mitigated pursuant to federal law. Lands east of the PG&E substation and the community garden are no longer being considered for habitat wetland mitigation. Please refer to the Final Mitigation Plans in Volume V of this FEIR/FEIS.

- 20.12. While BART's plans for (Mitigation Measure 1.1) "Creation of Creekside and/or Seasonal Wetland Habitats of Equal Wildlife Habitat Values" recognizes the value of the habitat that would be destroyed,

there is no assurance that creating artificial wetlands can ever provide habitat of equal value....The successful growth of selected vegetation in an artificial wetlands DOES NOT assure that the site also becomes a suitable habitat for particular animal species...

Response. Upon further consultation with the SFIA, it was determined and agreed that the mitigation measure for the San Francisco garter snake (SFGS) would not involve any habitat creation on the west of Bayshore parcel. However, several mitigation measures were developed to enhance the habitat values of existing wetlands onsite for the SFGS. Offsite wetland habitats will be created to mitigate for the loss of wetland areas that cannot be avoided, as defined in the Mitigation Plan for the Section 404 permit and Biological Assessment. Wetland habitats that have been temporarily disturbed by construction activities would also be restored onsite and compensated for offsite. Successful growth of selected plant species does not always equate to suitable wildlife habitat; however, careful planning, monitoring, and management can increase the chances of success. The most current and proven methods available will be implemented to reasonably assure the success of mitigation efforts. It should be pointed out that the majority of the wetlands on the west of Bayshore parcel have been created by past activities or are maintained by existing man-made facilities. For example, Cupid Row Canal and South Lomita Canal are man-made channels with tide gates or pumps that control water levels in these canals.

- 20.13. BART's description of its mitigation plan (page 3.7-4) does include a monitoring program for five years, but its "success criteria" only measures plant cover, density, and diversity. We commend BART's proposal to establish an endowment to provide for management of the SFGS population (page 3.7-6), but are concerned that, since the replacement wetlands have not yet been established, there is not assurance that any of the three endangered species will be able to flourish before their present habitat is destroyed when construction begins.

Response. Upon further consultation with the U.S. Fish and Wildlife Service (USFWS) and the SFIA, the monitoring of the California red-legged frog population has been included for those mitigation measures that are designed to enhance wetland habitat values. Given the sensitivity of the SFGS population on the site, the monitoring of SFGS populations via trapping surveys is considered too risky at this time. The USFWS has neither requested nor required monitoring of the SFGS population on the west of Bayshore parcel. Estimated time frames to determine the degree to which the SFGS population has responded to the proposed mitigation measures and unavoidable project impacts would be anywhere from five to ten years. Habitat enhancement mitigation measures will be initiated before and during project construction to offset the impacts during project construction.

- 20.14. The financial analysis in the September 1995 FRDEIR/S#2DEIS is no more adequate than the version presented in the January 1995 DEIR/SDEIS. Although cost estimates have been revised to define the proposed aerial alternatives and are in 1996 dollars, the fact remains that sufficient funds have not been identified to construct the project. The decrease in both state and federal money available for transit system capital and operating needs has accelerated over recent months, so that funds formerly assumed to be secure have already been reduced and may disappear altogether if present trends continue.

Response. Please refer to Response 6.67 for a discussion of the financial information provided in the environmental documents. Please refer to Response 16.27 for a discussion of California Transportation Commission (CTC) commitment to the project, Response 12.27 for a discussion of SFIA commitment to the project, and Response 16.16 for a discussion of the federal commitment to the project.

- 20.15. Table 6-3 is not reassuring, when we see that more than 35% of needed funds (all federal) are uncommitted....The fact that the CTC has already allocated \$14.6 million of FY 94 TCI revenues to this extension does not guarantee that all of the balance of the "committed" \$98 million will eventually be applied to this project. Furthermore, receipt of TCI funds depends on "the ability of SamTrans to

provide dollar-for-dollar matching funds.”...SamTrans is already implementing service reductions and fare increases as it works to maintain sufficient revenues and reduce operating costs.

Response. Please refer to Response 16.16 for a discussion of the federal commitment to the project, and Response 6.67 for a discussion of SamTrans’ ability to support its portion of project costs.

- 20.16. “Committed” Prop. 116 funds are called “...available to be allocated by the CTC...” MTC has thus far allocated \$1 million in Westbay Bridge Tolls to the BART–San Francisco Airport Extension, and BART shows this allocation increasing to \$10 million, counting these funds, also, as “committed.” The staff and boards of directors of BART and SamTrans need to work together to seriously consider how the project will be funded if any of the projected “commitments” do not fully materialize.

Response. Proposition 116 was approved by the voters of California in June 1990. This measure called for the sale of nearly \$2 billion in general obligation bonds to fund transit improvement projects across the state according to a very detailed expenditure plan. This plan includes a \$10 million apportionment to SamTrans for expenditure on BART extensions within San Mateo County. These funds were not required for the Colma extension and are therefore available to be allocated by the CTC to the BART–San Francisco Airport Extension. The entire grant amount is currently in trust, awaiting distribution to BART in fiscal year (FY) 1997.

- 20.17. SamTrans needs to prepare and present an updated financial capacity analysis, reflecting changes in state and federal funding allocations for transit, demonstrating the effects on SamTrans and CalTrain services to San Mateo County.

Response. Please refer to Responses 6.67 and 6.72 for a discussion of SamTrans’ capacity to support the project.

- 20.18. If funds to complete any BART–San Francisco Airport Extension alternative cannot be guaranteed, there remain two alternatives to be considered: scale back the BART extension to where it is affordable, perhaps at an intermodal connection with CalTrain and the ALRS outside the airport, similar to what has already been studied, or, do not extend BART beyond Colma, and commit realistically available resources to the upgrade, extension, and electrification of the already existing CalTrain service.

Response. The BART–San Francisco Airport Extension would not be undertaken until all funding sources were committed, and a financing plan completed, reviewed, and approved.

The commentor’s preference for a CalTrain/ALRS intermodal station is noted. However, the great majority of funds committed to the BART extension cannot be transferred to the proposed CalTrain extension project. Please refer to Response 23.11 for a discussion of the FTA’s New Rail Starts program.

- 20.19. There is no evidence that the CalTrain downtown extension was considered when calculating [Table 6-7, Cost Effectiveness Index.]

Response. The CalTrain downtown extension was not incorporated into the cost-effectiveness calculation for the BART–San Francisco Airport Extension, shown in Tables 6-7 of the Summary DEIR, DEIR/Technical Appendix, and the FRDEIR/S#2DEIS. For the cost effectiveness of that project, see the environmental documents released in early 1996. Please refer to Response 22.4 for further discussion of the CalTrain extension and the CEI.

- 20.20. LOS impacts are not a direct cost to BART, although the cost of mitigation is likely to be. The cost of increased congestion will be borne by drivers who do not use transit, in the form of time lost, increased costs of automobile operation, increases in air pollution, etc.

Response. Significant impacts to the level of service at local intersections are identified in the FRDEIR/S#2DEIS, and sponsors of the BART extension project would contribute toward mitigating impacts to intersections to an acceptable level. In cases where impacts to local intersections are significant and unavoidable, sponsors of the BART–San Francisco Airport Extension have stated that significant financial contributions would be made to the City of Millbrae, which in turn has stated its willingness to develop separate projects that would mitigate these impacts. The traffic impact to the intersection of El Camino Real and Millbrae Avenue was deemed significant and unavoidable in the FRDEIR/S#2DEIS, because any improvements to this intersection would cause other significant impacts.

- 20.21 Considerable traffic impacts would result from hundreds of daily trips of trucks necessary to transport materials to and away from the construction area. Construction of the footers necessary to support the aerial structure will cause traffic delays on the 101 freeway, due to constriction of the roadway to provide space for construction activities.

Response. The construction plan under the Aerial Design Option LPA includes access to Highway 101 via the southbound collector/distributor road for San Bruno Avenue. The construction-related volume of 20 to 30 trucks trips per hour would not be enough to cause additional traffic congestion. The 30 truck trips per hour maximum would only occur for an estimated two to three weeks when excavation and concrete pours occur simultaneously. As described on page 3.13-19 in the FRDEIR/S#2DEIS, the maximum truck volume during most of the construction duration would be an estimated five to 10 trucks per hour. The design of the access road to the southbound collector/distributor road would include acceleration and deceleration lanes to minimize safety problems created by these truck movements.

The details of the impact and duration of the construction of BART aerial structures over mainline Highway 101 and the proposed mitigation would be more fully developed during final engineering. As stated on pages 3.13-2 and 3.13-6 of the FRDEIR/S#2DEIS, the aerial portion within the Highway 101 right-of-way would be constructed in a traditional fashion, concurrent with the construction of new highway ramps into and out of the SFIA, as called for by the SFIA Master Plan. The Aerial Design Option LPA would be coordinated with SFIA improvements. Construction of the Highway 101 crossing would be performed between 11:30 P.M. and 4:30 A.M. to minimize the effect on peak-hour freeway travel and airport access. (Note that the 11:30 P.M. to 4:30 A.M. restriction would only apply to construction operations on the freeway, such as the erection of the foundation and columns as well as falsework beams across the freeway. After falsework is erected, traffic below could flow freely.)

Coordination with Caltrans would occur during the design and construction of the aerial structures over Highway 101, and Traffic Management Plans would be developed jointly with Caltrans, the SFIA, and the local communities (as appropriate). Construction work above the falsework decking would be performed during normal daylight construction hours. Both BART and SFIA work over Highway 101 would be planned to occur during the same construction period to avoid multiple traffic disruptions, including temporary rerouting that requires coordination among Caltrans, SFIA, City of San Bruno, City of Millbrae, and BART.

- 20.22 Footers that are 30' x 30' each (900 sq. ft.) will create a major negative impact on wetlands as well as when being constructed across the wetlands and 101 freeway.

Response. While any impact to wetland habitats is considered significant if unmitigated, the restoration of wetland habitats to pre-construction conditions in combination with those mitigation measures for permanent impacts are expected to reduce the impacts to wetland habitats to below a level of significance. These impacts are addressed in Section 3.13 of the FRDEIR/S#2DEIS, and appropriate mitigation has been developed during consultation with the resource agencies.

- 20.23. The report mentions the necessity to relocate the PG&E transmission lines where the aerial structure would cross the SFIA property west of Bayshore. The power lines would have to be undergrounded, which would provide a visual benefit.

Response. Undergrounding the PG&E transmission lines was an option under consideration at the time of the draft. While this option would have had visual benefits, it would have also had additional significant biological effects. Thus, the construction scenario now calls for approximately 1,000 feet of overhead transmission line to be raised above the new BART aerial structure. The raising of the existing transmission lines to pass over the BART wye-stubs would not create visual impacts since overhead lines are already part of the visual setting. Please refer to Response 12.19 for further details regarding PG&E transmission lines.

- 20.24. The power supplied to SFIA is conveyed from the west of Bayshore substation through underground ducts, which coincidentally lie in the same trace that is proposed for the aerial structure construction. The footers required to support the BART structure (there will be two on west of 101 SFIA property) will block access for the utilities.

Response. The existing power supply will be located by field surveying methods. The aerial structure footings will be designed to either avoid the underground ducts, or the underground ducts will be relocated to avoid the footings. This design effort will take place during preliminary engineering.

- 20.25. Major detours are also likely to result from the relocation of the PG&E duct in addition to the delays caused by construction of the aerial above 101.

Response. BART and its contractors would inform each affected jurisdiction of proposed construction plans, road detours, and road closures, and would work to achieve acceptable traffic detour/rerouting plans. These plans would allow local jurisdictions to develop alternate response routes in the event of emergencies. Please refer to Response 4.12, which describes planning activities associated with the aerial work over Highway 101, and is also applicable to the relocation of the PG&E duct.

Temporary detours, called shooflies, on the PG&E transmission lines would be required for either the underground or aerial raising alternatives, as discussed on pages 3.13-14 and 3.13-32 of the FRDEIR/S#2DEIS.

The PG&E relocation work would be scheduled prior to the construction of the BART aerial structure over Highway 101 and the west of Bayshore parcel to avoid delays.

- 20.26. The report proposes three possible sites for "Laydown Yards" to support construction activities between the mainline and the SFIA property west of 101. Alternative A, on the site of the now existing community garden, is also proposed as a possible site for mitigation of loss of wetlands habitat by conversion of this upland area to man-made wetlands. Simultaneous use for such divergent purposes would not be possible. Sites A, B, and C would all be subject to heavy truck traffic with accompanying noise and dust and possible disruption of neighborhood circulation as well as some level of risk to health and safety of neighborhood residents. Sites B and C would disturb habitat of endangered species.

Response. Please refer to Response 8.31 for a discussion of the alternative laydown areas and the planning to be coordinated with the local communities and interested agencies. If Alternative A were to have been selected, wetland mitigation within that area would not occur until after construction were completed. Alternative C was selected and approved by the USFWS. Impacts to willows and wetlands associated with Alternative B could have been avoided if the storage yard and staging areas were reduced in size and the access route modified, as stated in Section 3.13 of the FRDEIR/S#2DEIS.

- 20.27. Construction of the ALRS across the west of 101 would almost double the construction impacts described for the BART aerial structure, except that the ALRS is a much less massive structure. If the newly initiated study of an ALRS/CalTrain link demonstrates that this additional project should be constructed, the project sponsors will have to determine cumulative impacts and the mitigations needed to overcome negative impacts.

Response. Please refer to Response 13.4 for a discussion of the ALRS-CalTrain Connection Feasibility Study.

- 20.28. Our concerns are the same now as for the January 1995 DEIR, with an additional concern about the construction technique that would require construction of an earthen berm, with the potential for erosion-caused sediments to be deposited on wetlands. The berm's culverts every 50 feet would also serve as potential passage ways for wildlife, including the endangered SFGS. The less obtrusive trestle method would have less impact on wetlands.

Response. Upon consideration and consultation with the USFWS and the SFIA, the aerial wye-stubs would be built with the temporary trestle rather than an earthen berm. The reader should refer to the Biological Assessment in Volume V of this FEIR/FEIS for more details.

- 20.29. BART must demonstrate that construction of 15-20 foot sound walls to reduce impacts of noise to homes adjacent to the mainline will not result in the unintentional reflection of noise to homes on hillsides, most likely in Millbrae. The presently defined noise contour that limits the area in which homes are retrofitted for sound insulation could be threatened due to the cumulative effect of BART and SFIA noise reflected and bounced upward.

Response. Caltrans has demonstrated, through extensive studies, that sound walls have an insignificant effect with regard to increasing noise, contrary to claims reported in newspaper stories over the last couple of years. It should also be noted that residences in the hills to the west of the proposed BART alignment in Millbrae are approximately 1/4 mile to 1/2 mile away.

- 20.30. The Overview to the chapter on Environmental Analysis, on page 3-1, last paragraph, last line, reads, "BART may or may not adopt any of the mitigations." BART should clarify under what circumstances, if any, it would not adopt or implement available mitigations for significant impacts, or, does the statement apply only to insignificant impacts?

Response: The findings, prepared upon completion of the environmental document and at the time of project approval, must address in writing all significant environmental impacts that are identified for the project. For each significant impact, BART must identify specific project changes and/or feasible mitigation measures that will be implemented to avoid or significantly lessen the environmental impact, or explain why mitigation measures are not feasible. If the project is approved despite unavoidable, significant environmental impacts, BART must prepare a Statement of Overriding Considerations that presents the rationale for project approval. This statement must explain why the benefits of the project outweigh the significant, unavoidable environmental impacts.

BART need not adopt mitigation measures for insignificant impacts, although substantial refinements in project design, as well as mitigation measures, will be implemented to minimize or avoid as many insignificant impacts as is feasible. Please refer to Response 6.77 for a discussion of mitigation measures and BART's responsibility for their implementation.

21. GOLDEN GATE AUDUBON SOCIETY

- 21.1. Alternative VI for this project was selected earlier this year in part because it was "considered to be the Least Environmentally Damaging Practical Alternative since it would result in the least impacts to wetlands and the habitat of threatened and endangered species." FRDEIR at ES-1. We encourage

BART to continue to consider avoidance of environmental impacts as a top priority in choosing the final design of this project, and accordingly urge the rejection of the Aerial Design Alternatives in favor of the previously approved subway option.

Response. The commentor's support for the Alternative VI Tunnel Option into the San Francisco International Airport (SFIA) is noted. Due to the higher costs for the tunneling, coordination requirements with the SFIA expansion project and other reasons, BART and SamTrans have selected an aerial configuration into the SFIA as the Locally Preferred Alternative (LPA). Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the LPA at the close of the public review period. BART recognizes that impacts to wetlands and threatened and endangered species are factors in selecting the least environmentally damaging practicable alternative (LEDPA). Please refer to Section the 404(b)(1) Alternative Analysis in the Section 404 Public Notice in Volume V of this FEIR/FEIS for a more detailed discussion of how the Aerial Design Option was selected as the LEDPA. Please refer to Response 5.3 for further discussion of the selected LPA. Please also refer to Volume I of this FEIR/FEIS, which explains why BART is analyzing an aerial alignment into the SFIA.

- 21.2. The prior DEIR/SDEIS identifies the land known as the "west of Bayshore parcel" as having the highest quality wetland habitat within the project corridor. It also notes that Alternative VI would not "involve the permanent displacement of any high-quality wetlands" and that "Alternative VI would result in the least amount of wetland loss or displacement because it avoids the placement of any surface features on the west of Bayshore parcel, and is thus the least damaging alternative." DEIR/SDEIS at 3.7-7 to 3.7-11.

Response. Please refer to Response 21.5 for a discussion of identification of the least damaging alternative.

- 21.3. In contrast, the FRDEIR states that "It is not possible to avoid impacting the sensitive habitats in the west of Bayshore parcel during operation of the mainline tracks of the Alternative VI Aerial Design Option." FRDEIR at 3.7-2.

Response. Please refer to Response 21.5 for a discussion of impacts to sensitive habitats.

- 21.4. The FRDEIR also lists under "significant impacts which would occur only under the aerial design option"...four highly significant impacts on valuable habitat, including the placement of permanent structures within the sensitive west of Bayshore parcel. FRDEIR at ES-5. The enumerated impacts also include the loss of 9.87 acres of wetland and upland habitat which support the San Francisco garter snake ("SFGS"), 0.85 acres of which are wetlands that support the SFGS, the California red-legged frog, and the San Francisco forktail damselfly, as well as losses of other wetland areas.

Response. Please refer to Response 21.5 for a discussion of impacts to sensitive habitats.

- 21.5. The Bay Area has suffered a tragic loss of wetlands and other sensitive habitats over the course of this century, and habitat for the above-listed species, as well as countless other species dependent on wetlands for their survival, is in critically short supply. Given the shortage of such habitat in the Bay Area, BART's highest priority should be to avoid impacts to wetlands and other sensitive habitats in the first instance. Mitigation should be considered only as a last resort when impacts are unavoidable.

Response. As discussed in the FRDEIR/S#2DEIS, every practicable and feasible attempt has been made to avoid impacts to wetlands and other sensitive habitats. Indeed, BART has revised the originally-proposed project to avoid impacts to wetlands including the removal of the car wash facility from the west of Bayshore area.

BART also designed the proposed project to minimize any unavoidable impacts. Examples include use of a temporary construction trestle in the construction of the aerial wye-stubs, and use of temporary and removable materials (steel plates and/or interlocking grid platforms) to provide access to the required PG&E transmission line modification construction site. In addition, BART has developed a habitat creation and compensation program with the U.S. Fish and Wildlife Service (USFWS) for unavoidable impacts, as presented in the Biological Assessment and Biological Opinion in Volume V.

While the Alternative VI LPA is the least environmentally damaging from a wetland and sensitive species perspective, it is not the most feasible and practicable alternative in terms of project cost, compatibility with planned improvements and existing projects at the Airport, safety and security issues, and potentially significant issues related to hazardous materials. Recent actions by the U.S. Congress, BART, and the San Francisco Airports Commission created the need to develop and evaluate an alternative that addressed these issues, and thus offered a more feasible and practicable option. The Aerial Design Option LPA would be safer, have fewer security issues, would potentially involve fewer hazardous materials sites, and would be more compatible with the planned construction of the new Airport International Terminal than would the Alternative VI LPA. The Aerial Design Option LPA would minimize environmental impacts and keep costs at a level acceptable to the U.S. Congress and thus was considered the more feasible and practicable alternative.

- 21.6. The destruction of 9.87 acres of SFGS habitat that is identified in the Executive Summary as an impact unique to the Aerial Design Alternatives is not even mentioned in the Executive Summary Table, which is used to directly compare the impacts of various alternatives. The only analysis of this impact in the FRDEIR vaguely states that the impact will be “mitigated to insignificance,” then merely describes the same mitigation alternatives provided for in the DEIR for the subway alternative. No additional mitigation appears to be considered. It is not clear how the acreage impacted by the Aerial Design compares with the subway alternative, because there is no direct comparison of the two, but the Summary leaves the impression that almost 10 acres of extremely valuable habitat will be affected by the Aerial Design that would not be impacted under the subway option, and that no additional mitigation would be required.

Response. The Summary Table merely identifies the types of impacts the proposed project would have upon the resources. Consequently, impacts to wetlands and to sensitive wildlife species would occur with either the Aerial Design Option or Alternative VI, although to a much lesser extent with Alternative VI. Although this difference in the magnitudes of impacts is not identified in the Summary Table, it is well documented in the body of the text.

The proposed mitigation measures for the Aerial Design Option are similar in nature to those proposed for the other alternatives evaluated, as indicated in the Summary Table. Mitigation specifics are well documented in the body of the text and in the Biological Assessment, Biological Opinion, and Mitigation Plan for the Section 404 permit in Volume V.

Although the Summary Table may not indicate the details of expected impacts and proposed mitigation measures, these details are well documented in the text. In brief, the amount of San Francisco garter snake (SFGS) and California red-legged frog habitat that would be disturbed by the Aerial Design Option would be on the order of 10 to 12 acres. There would be no direct disturbance of SFGS habitat under Alternative VI, with indirect impacts to the adjacent SFGS habitat. Consequently, the mitigation measures for the two alternatives would differ in extent (i.e., more compensation area required for the Aerial Design Option) but would be similar in nature. In either case, the proposed mitigation measures would reduce the impacts to an insignificant level.

- 21.7. The reasoning behind the FRDEIR’s avoidance of a comparison of the two scenarios may lie in the assertion that either can be “mitigated to insignificance” by improving the Cupid Row Canal habitat and by creation of a “Habitat Restoration Plan” which will stockpile threatened species on a preserve. Perhaps the thinking is that any difference in affected acreage between the two design alternatives is

not important because either can be “mitigated” away by creation of a Habitat Restoration Plan. If so, this analysis is wrong. Creation “new”, man-made habitats can never compensate for the destruction of natural, functioning systems, and therefore avoidance of impacts must be the first priority. A project which affects 10 acres of habitat, even if the project affecting the 10 acres can be “mitigated” by creation of “new” habitat. BART must have such comparisons clearly stated before it can make a decision on the Aerial Design.

Response. The comment assumes the habitats on the west of Bayshore parcel are “natural functioning systems,” which they are not. All of the habitats on the site have been created or significantly altered by human activities. The uplands were created by imported fill and all of the wetlands were altered by past land use activities. The seasonal wetlands along Highway 101 were built by Caltrans. Both Cupid Row Canal and South Lomita Canal are constructed flood control channels with hydrologic regimes defined by tide gates in the case of Cupid Row Canal and pumps in the case of South Lomita Canal. These habitats are far from natural, yet they support a variety of wildlife species, including the endangered SFGS and threatened red-legged frog. Since the habitats in question are constructed, and yet currently support sensitive species, “new” constructed habitats with equivalent habitat potential for the species in question could reasonably compensate for related project impacts.

In developing mitigation measures for expected impacts, the avoidance of impacts was the first priority. However, it would be impossible to avoid all impacts for a project of this size and nature. Consequently, the impacts to the approximately 10 acres of SFGS are unavoidable, yet mitigable. Please refer to Response 21.5 for a discussion of the relative impracticality of Alternative VI.

- 21.8. There is no guarantee that the preferred “mitigation” will ever occur. The San Francisco International Airport (“SFIA”) owns the property on which the optimal (onsite) mitigation would take place (on the west of Bayshore parcel), and there has been no agreement by SFIA to allow such mitigation to occur. The FRDEIR vaguely states that if the preferred mitigation could not be accomplished, that other sites might be found off of the west of Bayshore parcel. This is unacceptable. BART should, at the very least, require mitigation on the west of Bayshore parcel if it selects the Aerial Design Alternative.

Response. The preferred location for onsite mitigation is within the project site. BART cannot “require” the San Francisco International Airport to allow specific mitigation measures to occur on the west of Bayshore parcel. BART has successfully negotiated an agreement with the SFIA (in concept) and USFWS for a series of onsite mitigation measures. Please refer to Response 12.15, and to the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS, for more details on the mitigation measures for the west of Bayshore parcel.

- 21.9. If the impacts to SFGS habitat and that of other species, threatened or not, are avoidable by selection of the subway alternative, BART should not equate avoidance with “mitigation to insignificance,” but should select the subway as the least damaging alternative.

Response. The Aerial Design Option LPA represents a less costly approach designed to minimize environmental impacts. The rationale for the Aerial Design Option LPA and the avoidance and mitigation of impacts are discussed in Response 21.5.

- 21.10. The FRDEIR states that 0.04 acres of wetlands would be affected by the aerial wye-stubs. In fact, that is the merely the size of the footprint of the supports. The existence of trains running through the remaining habitat may affect wildlife in the area in perpetuity. The FRDEIR fails to address any indirect impacts on avifauna and other wildlife caused by the periodic passage of trains through the area.

Response. Trains currently run through the area daily, and the west of Bayshore parcel is bounded on one side by Highway 101, exposing it to ongoing noise from automobile traffic. The addition of BART trains above the west of Bayshore parcel would not significantly increase the already existing

background noise levels at the site. Adverse affects to wildlife associated with noise from overhead tracks are not anticipated.

- 21.11 The FRDEIR admits that the existence of "Aerial guideways across SFIA property west of Highway 101 contrasts with undeveloped, natural setting and obstructs views of San Bruno Mountain from Madrone Street in the Marino Vista neighborhood," see Table ES-2, and recognizes as an unavoidable adverse impact associated only with the Aerial Design Options that "The elevated guideways of the wye-stub north and south legs would alter the visual setting and detract from the SFIA property west of Bayshore as a scenic open space resources." FRDEIR as ES-5.

Response. Impact 6 on page 3.3-3 of the FRDEIR/S#2DEIS acknowledges that the aerial wye-stub would adversely alter the visual setting. The commentor's opposition to the Aerial Design Option is noted.

- 21.12. Under any design option, we ask that BART remain keenly aware of the impact that construction will have on the sensitive habitats in and around the project corridor, and to make every effort to avoid such disturbances to the extent possible. All storage and stockpile areas should be carefully designed to avoid any unnecessary affects on wildlife and habitat. Moreover, mitigation measures that consist of creating "new" or "enhanced" habitat nearby should be completed and functioning prior to construction to avoid loss of individuals for lack of nearby alternative habitat, and temporary habitat alternatives should be created for the short-term displacement of individuals during construction.

Response. Please refer to Response 21.5 for a discussion of impacts and mitigation measures.

22. PENINSULA RAIL 2000

- 22.1. The existing CalTrain system can be upgraded to a Rapid Transit System that can complete our goal of ringing the Bay with rail for several Billion dollars less, and many years sooner, than a BART line could.

Response. The commentor's support for an upgrade to the existing CalTrain system is noted. Please refer to Response 10.3 for a discussion of how selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) will not preclude future CalTrain improvements.

The CalTrain extension to downtown San Francisco, including an alternative terminating at the Transbay Terminal, is the topic of other studies. The extension of CalTrain to downtown San Francisco and upgrades, including electrification, were recently analyzed in the *CalTrain San Francisco Downtown Extension/System Upgrades Final Report*, March 1994. In 1995, the Peninsula Corridor Joint Power Board (JPB) initiated a *CalTrain San Francisco Downtown Extension Project Draft Environmental Impact Statement/Report*. The JPB met in January 1996 to refine its proposal to extend CalTrain into downtown San Francisco. Based on information contained in the Design Options Screening Report, which was released for public review last October, the JPB dropped the Market/Beale Station alternative from further consideration, citing technical problem, community impacts, and higher costs. The Transbay Terminal Station site alternative with a series of options and the No Build are currently under environmental review. The DEIR/DEIS is scheduled for public circulation and comment in the Fall of 1996.

- 22.2. The new version of Alternative 6 is NOT compared with the TSM Alternative 2. Why?

Response. The new version of Alternative VI (the Aerial Design Option) is compared to the TSM Alternative in the Executive Summary at the front of the FRDEIR/S#2DEIS.

- 22.3. This document has ridership numbers that do not make sense. For example, if BART is extended to SFO, AND, later, CalTrain is extended into downtown San Francisco, CalTrain ridership will increase by 25% and BART ridership will only decrease by 4%. This does not agree with previous estimates.

Response. Daily BART boardings are estimated to be 401,400 under the Aerial Design Option LPA in 2010, and daily CalTrain boardings are estimated to be 46,700 under the same alternative in the same year, both without the CalTrain downtown extension. Given the vast difference in total boardings between the two transit systems, stating only the percentage change with the CalTrain downtown extension does not present the magnitude of the patronage impact. With the CalTrain downtown extension, daily BART boardings decrease by 15,900 trips, and daily CalTrain boardings increase by 11,100 trips under the Aerial Design Option LPA in 2010. On page 3.1-5 of the FRDEIR/S#2DEIS, it states that these estimates of boardings with the CalTrain downtown extension are based on the patronage forecasts for Alternatives 3A and 3B, as described in the AA/DEIS/DEIR. The patronage estimates with the CalTrain downtown extension presented in the FRDEIR/S#2DEIS are consistent with the patronage estimates in the AA/DEIS/DEIR.

- 22.4. The BART estimate of \$29 per new rider is based on CalTrain staying at 4th & Townsend AND 19,000 transfers from CalTrain to BART at Millbrae. \$50 per new rider is a more realistic figure with CalTrain extended into downtown San Francisco.

Response. The 1992 Alternatives Analysis, prepared by Metropolitan Transportation Commission (MTC), compared the cost-effectiveness indices of the BART extension with and without a CalTrain extension to downtown San Francisco. As shown in Table 6.22, Alternative 5A Highest Cost Option, which was selected as the LPA, showed a cost-effectiveness index (CEI) of \$27.90 without the CalTrain extension, and \$30.96 with the CalTrain extension. This suggests a very different cost relationship than that proposed by the commentor, in which a CalTrain extension would increase costs per new transit rider.

This may be due to some confusion about the CEI calculation. The calculation is for costs per new *transit* rider, and does not distinguish between a BART rider, a CalTrain rider, or a rider who transfers between the systems. Therefore, the CEI does not distinguish between a patron who rides BART from San Mateo County to San Francisco, one who takes CalTrain to San Francisco, and one who takes CalTrain to Millbrae and transfers to BART to arrive in San Francisco.

- 22.5. To be cost-effective, the DOT criteria for cost per new rider must be less than about \$12. That means that the BART–San Francisco Airport Extension is about four times more expensive per new rider than a transit project should be! If this DOT criteria is ignored, than any cost-ineffective project can be eligible for Federal money. Is the DOT cost-effective criteria going to be ignored?

Response. Please refer to Response 6.76 for a discussion of the cost-effectiveness index, and the fact that there is no standard a project's CEI must achieve in order to be funded.

- 22.6. The estimate of 19,000 transfers from CalTrain to BART makes no sense. A few hundred people may transfer but NOT 19,000! Since the SamTrans Financial Plan relies heavily on this 19,000 figure, the CalTrain-to-BART transfers must be re-evaluated with CalTrain extended into downtown San Francisco, as per MTC Resolution 1876.

Response. The MTC travel demand model predicted the number of transfers between CalTrain and BART. This regionally approved model forecasts that transit riders would take the fastest path to their destination, assuming the other factors affecting their choices remain equal. The transfer of patrons between the two systems reflects the fastest transit path to downtown San Francisco for many riders because these riders could then walk to their destinations rather than transferring to a bus at the 4th and Townsend terminus of CalTrain. Table 3.1-7, Daily Intermodal Transfers Between Rail Services, in the FRDEIR/S#2DEIS includes transfer volumes between CalTrain and BART with and without the

CalTrain Downtown Extension that address this impact. Transfers between CalTrain and BART are estimated to be 24,100 under the Aerial Design Option LPA without the CalTrain Downtown Extension in 2010 while these transfers are estimated to be 11,800 under the Aerial Design Option LPA with the CalTrain Downtown Extension in 2010. Please also refer to Response 6.8 for a discussion on the CalTrain Downtown Extension.

- 22.7. The 1997 MTC report on ridership projects about 25,000 riders per way for Colma-SFO with CalTrain extended into downtown San Francisco. Why isn't this figure in the report?

Response. The increase in daily BART boardings under Alternative 3B in the AA/DEIS/DEIR (which is the same alternative as the Base Case Alternative in the DEIR/SDEIS except that which has 3B includes the CalTrain downtown extension) compared to the No Build Alternative in the AA/DEIS/DEIR would be 26,800 trips in 2010. The patronage estimates in the AA/DEIS/DEIR were based on a 1991 MTC modeling analysis and report. The increase in daily BART boardings under the Aerial Design Option with the CalTrain downtown extension compared to the No Build Alternative, as reported in the FRDEIR/S#2DEIS, would be 26,100 trips in 2010. The patronage estimates reported in the FRDEIR/S#2DEIS are consistent with those reported both in the DEIR/SDEIS and the AA/DEIS/DEIR, given the differences in each alternative analyzed. The specific patronage estimate cited in this comment is not referenced by the commentor. The reference to "per way for Colma-SFO" may be the patronage estimates at stations from Colma to the SFIA. However, the number of BART entries and exits under Alternative 3B in the AA/DEIS/DEIR at the Colma, Chestnut, Tanforan, and external SFIA stations would be approximately 56,700 patrons.

- 22.8. Recently, three local transit agencies and the City/County Association of Governments of San Mateo County unanimously endorsed a study of a CalTrain connection into San Francisco Airport.

Response. Please refer to Response 4.9 for a discussion of connectivity between the Airport Light Rail System (ALRS) and CalTrain. In addition, please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- 22.9. Most of the airport workers live in areas convenient to CalTrain but not to the proposed BART-SFO line. We believe that many of the 35,000 airport workers will use the CalTrain/ALRS (Airport Light Rail System) rather than deal with the increasing traffic congestion on Highway 101.

Response. Please refer to Response 6.10 for a discussion of SFIA employees living south of the Airport. Traffic impacts to Highway 101 with alternatives that include a direct connection between CalTrain and the ALRS were examined in the DEIR/SDEIS. For example, Table 3.1-76, Freeway Level of Service 2010, in the DEIR/Technical Appendix includes all the alternatives examined in the DEIR/SDEIS. The table indicates similar traffic volumes on Highway 101 south of the SFIA for the BART build alternatives, with variations of 200 peak-hour vehicles among the alternatives. Please refer to Response 4.9 for a further discussion of differences in CalTrain ridership accessing the SFIA.

- 22.10. A CalTrain/ALRS connection must be included in the BART-SFO study.

Response. Please refer to Response 6.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- 22.11. This BART-SFO report still includes a BART extension past the Airport and located in Millbrae. Why? With CalTrain connected to the Airport ALRS, a BART station in Millbrae makes no sense. BART-Millbrae would eliminate about 220 homes in Millbrae and cost \$250-200 million more and for what purpose?

Response. Please refer to Response 26.6 for a discussion of the need for the Millbrae Station.

- 22.12. BART has NOT responded to the hundreds of questions asked during the BART-SFO Draft EIR/EIS hearings in March 1995. Why? The original reason BART gave was because of the deadline for getting FTA funding. That deadline has now passed but still no answers to the questions.

Response. The 60-day public comment period for the DEIR/SDEIS began on January 13, 1995. One hundred and fifty persons testified at public hearings, held February 15, February 18, and March 4, 1995 to receive verbal comments on the DEIR/SDEIS. By the conclusion of the public comment period on March 13, 1995, 233 agencies, organizations, and individuals had submitted written comments on the DEIR/SDEIS. In late March 1995, staff initiated the preparation of responses to public comments submitted during the DEIR/SDEIS review period.

Actions of the U.S. Congress, BART, and the San Francisco Airports Commission relating to project costs and implementation of the 1989 San Francisco International Airport Final Draft Master Plan prompted consideration of other options for bringing BART service into the SFIA. The FEIR/FEIS was delayed because the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) require that environmental consequences be analyzed and disclosed to the public. To satisfy the statutory mandate to present analyses of the new options, an additional document (FRDEIR/S#2DEIS) was prepared as a "recirculation" of the DEIR prepared pursuant to CEQA and a supplement to the DEIS prepared pursuant to NEPA. The FRDEIR/S#2DEIS was released October 6, 1995, which began a 45-day public comment period. All comments received on the DEIR/SDEIS and the FRDEIR/S#2DEIS are included in the FEIR/FEIS.

23. REGIONAL ALLIANCE FOR TRANSIT

- 23.1. We believe that changed circumstances require you to revisit the 1992 MTC alternatives analysis and consider an alternative using existing heavy rail ("CalTrain") between the San Francisco International Airport ("SFO") and downtown San Francisco at the site of the existing Transbay Transit Terminal.

Response. Please refer to Response 6.8 for a discussion of the study of the CalTrain extension to downtown San Francisco.

- 23.2. If reconsideration [of a heavy rail, CalTrain alternative] is not possible we continue to recommend a no-build alternative because of the exorbitant cost of this project.

Response. The commentor's support for the No Build Alternative is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) at the close of the public review period for Volume I of the FEIR/FEIS. Please refer to Section 1.3 of the DEIR/SDEIS for an explanation of the need for the BART-San Francisco Airport Extension. There are a number of reasons to extend BART into San Mateo County. One impetus is to respond to the public mandate. In 1985, 1987, and 1992, San Mateo County voters approved ballot measures supporting the extension of BART into the county; another is to reduce congestion on Highway 101 and I-280 that is not airport-directed; a third is to improve air quality. A reduction of 485,000 vehicle miles traveled in 2010, as a result of the BART extension, will reduce both congestion and auto-related air pollution. As air passengers increase at the Airport by over 60 percent between 1990 and 2006, access to BART will become increasingly important in maintaining traffic flows on the two area freeways.

In addition, since 1972, over 90 alternatives have been evaluated in the San Francisco to San Jose corridor. Section 2.5, Alternatives Selection Process, of the DEIR/Technical Appendix summarizes alternatives considered and rejected since 1972. As discussed, all of the alternatives being studied were determined, through an extensive public process, to be the only feasible build alternatives that would accomplish project objectives.

- 23.3. Your FRDEIR/S#2DEIS at section 3.1 acknowledges that the CalTrain downtown extension may be included in the MTC RTP and that the Joint Powers Board ("JPB") has initiated a DEIS/DEIR for that project. Your FRDEIR/S#2DEIS does not take the next logical step and call for a new alternatives analysis that takes a viable Downtown Extension into account. For less money the region can have seventy miles of mid-speed heavy rail with equivalent airport access (either by the ALRS or directly entry onto airport property).

Response. Please refer to Response 6.8 for a discussion of why the CalTrain extension to downtown San Francisco was not analyzed in this document.

- 23.4. The DEIR/DEIS and FRDEIR/S#2DEIS also need to address the fact that BART is using antiquated thirty year old non standard technology whereas CalTrain uses standard technology for which new developments are being made daily by companies all over the world. In addition, a standard rail alternative will make it possible to use the same rails to allow a future high speed train to access SFO on its way to a downtown San Francisco Terminal.

Response. BART technology consists of innovative operating software that surpasses other system's standards. BART's Central Control System permits the operation of 75 trains and allows trains to travel up to 80 mph. BART is implementing a series of projects that will lower Transbay train headways from 3.75 to 2.25 minutes, with an average daily capacity of 312,700 passengers. In comparison, if CalTrain were to provide service with BART extension headways (every 4.5 minutes in the peak period and every 7.5 minutes during the base period), CalTrain would have to purchase numerous locomotives and cars. Increasing CalTrain service current weekday average of 3.2 trains per hour to BART's San Mateo County service of 9.1 trains per hour, would require a huge capital expense in terms of vehicles alone. Furthermore, CalTrain daily passenger load is approximately 36,400 (refer to Table 3.1-2, 1993 option). A CalTrain upgrade project would cost \$1,147 million escalated to midpoint of construction, or more than the \$1,070 estimated for the BART extension. Please refer to Response 6.8 for a further discussion on a CalTrain Extension to downtown San Francisco.

The BART Central Control System, which performs supervisory control of train operations and remote control of electrification, ventilation, and emergency response systems, will be able to support all the BART extensions as well as future changes to the BART system. A study was initiated by the BART District to develop strategies for modification and replacement of the supervisory control system to cope with projected increases in the number of the trains operating on the system. As a result of the study, the District initiated a project named Integrated Control System. The goals of the project were replacement of obsolete and ultimately unmaintainable equipment; removal of the system train capacity constraint; provision of transportable, flexible software; provision of an integrated network; and improvement of system ergonomics. The project was completed on February 8, 1991. Furthermore, in order to meet the processing needs of the future BART system, the new vehicle Automatic Control Center (ATC) has substantially reduced automatic train control hardware, the single largest cause of service disruptions. This has resulted in the decrease of ATC-caused service disruptions.

Currently BART is investigating the latest technology to triangulate the location of trains by satellite. This would allow for closer spacing between trains.

- 23.5. We still believe that the current DEIR/EIS and FRDEIR/S#2DEIS address the wrong question. Rather than determine the best way to get passengers, visitors and employees to and from SFO, they focus on how to get BART from Colma to SFO. Please ask the right question and get an answer that will give the region much more "bang" for much less than 1.2 billion "bucks."

Response. The commentor's support for a CalTrain alternative is noted. Please refer to Response 23.2, which describes the scoping process and how the current set of alternatives under study in the DEIR/SDEIS was chosen for evaluation.

- 23.6. We have major concerns about the impacts on other transit systems, particularly CalTrain and SamTrans. Those impacts, particularly as they cumulate over a series of decisions necessary to complete these projects, are not adequately studied in these documents.

Response. Please refer to Response 6.67 for a discussion of SamTrans' capacity to support the project without compromising CalTrain and SamTrans service.

- 23.7. In order to try to justify this project, the environmental documents posit a massive transfer of passengers from CalTrain to BART at Millbrae. While 4,200 of these trips are forced transfers onto BART to access SFO, the remaining 15,700 are CalTrain riders from the peninsula to San Francisco. Why would CalTrain passengers pay more and spend more time in order to go from Palo Alto or San Mateo to downtown San Francisco via Daily City?

Response. Please refer to Response 22.6 for a discussion of transfers between BART and CalTrain.

- 23.8. We are deeply concerned that BART will continue to use its formidable political influence and heavily funded public relations apparatus to cannibalize CalTrain by forcing excessive turnbacks at Millbrae, just as they have forced SamTrans to detract from its most profitable lines. That would accomplish BART's short term objective of forcing unwilling CalTrain passengers to transfer to BART. It would also contribute toward BART's long term objective of taking over CalTrain's peninsula route.

Response. The proposed extension is not designed to take over CalTrain. All BART alternatives would result in the development of a coordinated transit system that links local and regional transit systems by providing intermodal connections with SamTrans, CalTrain, and the Airport Light Rail System (ALRS). A transfer between BART and CalTrain has been one of the underlying factors in the definition of all of the BART build alternatives carried forward for evaluation in the DEIR/Technical Appendix. SamTrans, as one of the sponsors of the project, has made sure that the BART extension project complements their bus system and improves transit service in San Mateo County.

The proposed BART extension would not fragment or weaken the existing transit system. BART and CalTrain serve different markets. They are complementary, not competing, systems. In fact, MTC predicts that all of the BART alternatives would result in increases in CalTrain ridership. The CalTrain ridership increases would be approximately 38,000 to 47,000 total daily boardings in the year 2010 under all BART build alternatives. CalTrain ridership increases under all build alternatives in the DEIR/Technical Appendix would be due to the combined impact of projected growth in the region, physical improvements, service improvements, and the provision of a CalTrain/BART transfer.

Both BART and CalTrain are needed to meet forecast future demand, and the best service to San Mateo residents would be available from a BART-San Francisco Airport Extension in conjunction with existing CalTrain service. Please refer to Response 32.72 for a discussion of BART and CalTrain Service.

- 23.9. In the short term the diminishing of CalTrain would result in greatly increased auto traffic on 380 and 101 around Burlingame and Millbrae. All the plans call for huge parking lots at the end of the BART lines. While there is some analysis of the BART generated traffic, there is inadequate analysis of the cumulative traffic that will be caused by the combination of the BART and SFO expansion traffic.

Response. CalTrain service is projected to increase, not diminish, under the BART build alternatives. The traffic impacts in Burlingame and Millbrae under the BART build alternatives were analyzed, and the results are included in the FRDEIR/S#2DEIS and the DEIR/SDEIS. Please refer to Response 18.9 for a discussion of the analysis of the cumulative impacts of the SFIA Master Plan to the BART extension.

- 23.10. Again, a CalTrain alternative would spread the traffic along CalTrain's seventy mile right of way and allow for much greater probability of local transit access to the CalTrain stations.

Response. According to the Metropolitan Transportation Commission (MTC), the Peninsula travel corridor between San Jose and downtown San Francisco "... would serve a different travel market than the proposed BART extension from Colma to SFO."¹ The BART extension primarily serves commuters from the northern third of San Mateo County going/coming to jobs in downtown San Francisco. There is some overlap between BART and CalTrain markets in trips between San Bruno, Millbrae, and downtown San Francisco, but CalTrain also serves downtown San Jose, midpoints along the Peninsula, and Gilroy.

When results of the 1980 census became available, SamTrans staff examined home-to-work travel patterns in the wake of predictions from Caltrans District 4 that Highway 101 and I-280 would reach stop-and-go levels at their confluence near the San Francisco-San Mateo County line by the end of the century. Analysis of these patterns and the transit strategy to address them are encompassed in the SamTrans Century Plan, adopted by the SamTrans Board of Directors in 1985.

Mandated by State Senate Concurrent Resolution No. 74, which demanded a long-range transit blueprint for the Peninsula and recommended a joint powers authority to administer CalTrain, MTC also formulated its own recommendations for alternative rail systems. MTC and SamTrans recommendations were strikingly similar. To quote the 1985 SamTrans Century Plan: "The Century Plan findings brought to light the existence of two transit markets in San Mateo County: a northwest county market with a large proportion of work trips being made into San Francisco, and a bayside transit market also oriented toward San Francisco, but with a growing number of work trips being made to the San Jose area."

Findings from the 1980 census have remained remarkably accurate. The 1990 census revealed nearly 80,000 daily commuters from San Mateo to San Francisco County, some 71 percent of them originating north of Millbrae on the I-280 corridor served by BART. Interim stations along the prospective BART corridor, not San Francisco Airport alone, were critical to early SamTrans planning for the proposed SFIA extension. Planners projected 30,000 weekday trips through Daly City and Colma BART Stations. Other ridership projections include Hickey Station (South San Francisco) 6,300; Tanforan, 8,000; SFIA, 18,700; and Millbrae, 9,000 (excluding CalTrain transfers).

It is evident that only a convenient rail facility in the I-280 corridor can service these riders and provide relief for impacted end-of-century freeways.

MTC formally recognized this strategy in 1988 with adoption of Resolution No. 1876, which designated BART/SFIA and the CalTrain downtown extension as two of the three projects in the New Rail Transit Starts and Extension Program for the nine-county Bay Area.

Three times (in 1985, 1987, and 1992), the two-corridor concept was submitted to the district electorate via countywide ballot. Each time, the region's two rail improvement projects for BART and CalTrain won resounding voter approval. San Mateo County voters were unwilling to leave commuters in the heavily populated I-280 corridor without a viable rail alternative.

SamTrans directors thus were handed a clear mandate to act on the findings of the 1985 Century Plan. While they invoked a series of measures to preserve and enhance CalTrain service, they also negotiated to extend BART from its terminus in Daly City. Directors and staff worked with regional, state, and federal agencies to assemble the required capital funding. The fruits of these efforts will become apparent in early 1996 with the opening of the Colma BART Station and action next spring by SamTrans and BART directors on a final alternative for an extension of BART to the SFIA.

¹ BART San Francisco Airport Extension, Alternatives Analysis/Draft EIS/EIR, Conceptual Definitions of Alternatives, Task 4/Deliverable 5, page 2-3, by MTC, October 1990.

- 23.11. The documents also do not adequately discuss the extent to which this project and the CalTrain downtown extension are competing for the same money. We understand that the statement has been made at the highest levels of the Transportation Department that the funds for this project could be reprogrammed to the CalTrain downtown extension.

Response. The BART and CalTrain extension projects are not competing for the same federal funds. MTC explicitly segregated the BART–San Francisco Airport Extension and the CalTrain extension into two separate federal funding programs in crafting the Resolution No. 1876 Agreement on Regional Rail Extensions. The BART extension is being partially funded with New Rail Starts and Extension revenues, which are discretionary, whereas the CalTrain extension is proposed to be funded with Fixed Guideway program funds, a formula-based program. These two federal programs receive separate and distinct appropriations from Congress and have distinct and different standards, requirements, and processes.

More information on the source of the statement that funds could be reprogrammed from the BART to the CalTrain extension project would be required before it could be cited as factual, since it is contrary to FTA policy.

- 23.12. As the League of Woman Voters and the San Mateo Grand Jury have pointed out, this project may well bankrupt SamTrans. The documents [d]o not adequately discuss the cumulative impacts on SamTrans finances of the various actions called for by this project.

Response. Please refer to Response 6.67 for a discussion of SamTrans' capacity to support the project.

- 23.13. SamTrans has...raised fares on its commute routes into San Francisco for the express purpose...of forcing its patrons onto BART. SamTrans commute routes &B, &F and %M carried one-third of all SamTrans patrons during September 1995, yet this lost revenue is not accounted for in the documents.

Response. Please refer to Response 18.20 for a discussion of fare returns. Lost revenue is more than offset by cost reductions associated with reduced commute route service.

- 23.14. This is not the only time BART has tried to influence artificial fare increases to force patrons onto BART. BART Executive Director White sent a letter to AC Transit General Manager Banks urging her to raise AC Transit transbay fares. BART already costs less on transbay runs because, unlike other transit operators in the region, it chooses to capitalize its maintenance.

Response. The BART, AC Transit, SamTrans, and other transit operators' Boards of Directors throughout the Bay Area each establish their own fare schedules. Each agency also makes its own decisions regarding capital versus operating expenses.

- 23.15. The documents also do not talk about the cumulative impact of the possible need for San Mateo county to provide further subsidies to CalTrain if the projected transfers to take place.

Response. Please refer to Response 9.20 for a discussion of transfers between CalTrain and BART and impacts on CalTrain north of the transfer station.

- 23.16. The financial figures have very optimistic figures for sales tax projections and do not deal realistically with the rapid and continued loss of federal operating subsidies and state transportation funding shortfalls.

Response. Please refer to Responses 6.67 and 6.71 for a discussion of SamTrans' capacity to support the project.

- 23.17 We have very grave concerns -- concerns that are not quieted by the documents -- regarding the continued viability of SamTrans if this project goes forward.

Response. Please refer to Response 6.67 for a discussion of SamTrans' capacity to support the project.

- 23.18 When BART was built a number of questions were raised about its failure to serve the disadvantaged South-East portions of San Francisco. Those questions continue. This project would continue the "red-lining" of that part of San Francisco.

Response. Please refer to Responses 10.3 and 6.8 regarding the selection of an LPA and the extension of CalTrain to downtown San Francisco.

- 23.19 A CalTrain option, by contrast, could be used to open [the southeast portions of San Francisco]...to opportunities at [S]FO and in Silicon Valley. It would link easily with the proposed Third Street light rail project. The largest growth in CalTrain ridership in the past few years has been the reverse commute. Ridership into San Francisco has been stagnant and, in our opinion, will remain stagnant until the downtown extension is completed. Residents of South East San Francisco should be able to continue to access those job opportunities together with the job opportunities at SFO when CalTrain is connected directly with SFO via the ALRS.

Response. Please refer to Response 6.8 for details regarding the CalTrain extension and transit patronage. Future CalTrain improvements would not be precluded by the BART extension. The Third Street light rail project is under study at the time of publication of the BART extension FEIR/FEIS. This proposed project would provide light rail service along the Third Street corridor in San Francisco that connects Market Street to Bayshore Boulevard where it crosses Highway 101. As discussed in Response 23.8, CalTrain service is complementary to service provided by BART. The potential connections between the proposed Third Street light rail project and CalTrain service would not be affected by the BART extension project.

24. SAN BRUNO CITIZENS COALITION

- 24.1. Of all the build alternatives, Alternative VI is still the most preferred and supported alternative. The line must be bored-tunnel from Euclid to south of Sylvan, coming up on the east side of the existing CalTrain tracks. Bored-tunnel through San Bruno would mitigate most of the concerns of our city (i.e., traffic problems at San Bruno, San Mateo, and Huntington Avenues during construction, impaired access to local businesses, traffic clogging up residential streets, disruption of CalTrain service during construction with track closures and shooflies, and safety of school children crossing the tracks daily at Angus.

Response. The commentor's support for Alternative VI with a bored tunnel configuration through the City of San Bruno is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) at the close of the public comment period for Volume II of the FEIR/FEIS. Please refer to Response 10.3 for further discussion of the selected LPA. A bored tunnel through downtown San Bruno is a possible construction option to the cut-and-cover construction method described under Alternative VI. However, this option is not feasible, for the following reasons:

1. The bored tunnel option is approximately \$25 million more expensive than the cut-and-cover method. This difference is more than adequate to mitigate the impacts on surface activities due to cut-and-cover construction.

The A.J. Moore Associates report shows lower mitigation costs for tunnel option construction in the following categories:

Downtown Utilities:	\$9.0 Million
Property Damage:	
Belle Air	\$1.0 Million
Downtown	<u>\$8.6 Million</u>
Total	\$18.6 Million

With respect to utilities, investigation by BATC, BART's engineering consultants, indicate that the eight utilities identified by the commentor are located in the adjacent streets or the SPTCo right-of-way. Reconstruction would be required only at crossings of the BART structure. The proposed CalTrain shoofly would remove the southbound track from service and allow the trains to operate in two directions on the northbound track. In no case would a shoofly track be located over a gas or fuel pipeline. The utility relocation savings for the tunnel option is in the range of \$1 million for the segment from Euclid Avenue to Sylvan Avenue.

With respect to property damage, there is no justification in the report for the cost savings of \$9.6 million.

Even if the A.J. Moore Mitigation cost estimates are accepted, there is a \$6.4 million cost savings for a cut-and-cover subway.

2. Tunnel construction activities on the surface would be concentrated at the triangular plot bounded by I-380, the CalTrain tracks, and Huntington Avenue. These activities would occur for 16 hours per day for at least 12 months and would include the stockpiling and hauling of excavated earth materials and supplies, and establishing a reporting area for tunnel workers.
3. Tunnel ventilation structures would be required in the vicinity of Sylvan Avenue and Euclid Avenue. These structures would be similar to Figure 3B on page 143 of the Design Appendix and would be constructed by the cut-and-cover technique.
4. The tunneling operations would cause settlement on the surface which would require some repair work on existing pavements and utilities. The amount of settlement cannot be estimated until soil borings are performed as part of preliminary engineering.

In general, tunnel construction is considered to be feasible only where cut-and-cover construction is impossible due to depth, soil conditions, or uninterruptable surface activities, such as freeways or airports.

- 24.2. The San Bruno Yard location and access road -- The route should not go down 1st Ave and through that neighborhood. We are already going to have enough impacts, and if we can avoid some by sending the construction trucks directly out to Highway, then that is what we should do. And the Yard should be located as far away from residential areas as possible, so Yard B would be the correct yard.

Response. Please refer to Response 11.3 for a discussion of the truck haul route from the BART extension laydown area under the Aerial Design Option LPA in the vicinity of the Belle Air neighborhood.

- 24.3. Car wash access road and traffic. How much traffic will come and go to this facility and where is their access road?

Response. The proposed BART car wash facility in San Bruno under the Aerial Design Option LPA has been relocated to adjacent to the existing Daly City Shop/Yard. Traffic to a car wash facility would consist of maintenance vehicles to transport staff and supplies. The average rate would not exceed five vehicle round-trips per day. Traffic to the gap breaker station located across from San Felipe Avenue would average less than one trip per month. Please also refer to Response 8.5 regarding access to the gap breaker station.

- 24.4 There is a reference to reconstruction Angus Avenue but it is unclear what this means. Is Angus going to be closed off at some point in time? How long? And if so, how do school children and other pedestrians get around this much used thoroughfare? With bored tunnel this construction doesn't even happen, I assume?

Response. Temporary decking would be constructed across the CalTrain right-of-way in order to continue two-way vehicular traffic operations and pedestrian movement during construction of the BART extension. The decking of the street would include sidewalks with fences on the outside of the sidewalks adjacent to construction activities. Construction of this deck on Angus Avenue across the CalTrain right-of-way would require approximately two to four months, depending on the extent of utility relocation needed.

25. SAN FRANCISCO PLANNING AND URBAN RESEARCH ASSOCIATION

- 25.1. We do not feel that the September document deals with our previously expressed concerns regarding the ridership data and how it is presented. For instance, data is presented regarding the projected daily patronage at the Millbrae station (Page 3, 1-6), intermodal transfers between CalTrain and BART at the Millbrae Station (page 3, 1-11) and daily boardings for various operators (pages 3, 1-4). However, that information is not coordinated or analyzed. For instance, the projections appear to state that in 1998, 21,700 CalTrain passengers out of a total daily ridership of 41,700 will transfer from CalTrain extension is not built and BART design option X is built [sic]. Thus, of the 30,900 patrons boarding BART in 1998 at the Millbrae Station, 21,700 of 70% would be transferring from CalTrain. If this conclusion is correct, the projections are quite extraordinary and need more explanation to establish their credibility. As we stated in our previous letter a more detailed breakdown and discussion of ridership on BART and CalTrain must be prepared to thoroughly understand the consequences of the new alternatives.

Response. The variety of transit patronage information requires separate tables to present the results of the patronage analysis. Appendix Table A, Alternative VI Aerial Design Option BART Station Entries and Exits, in the FRDEIR/S#2DEIS, includes information on daily volumes by access mode and trip purposes, though not for specific transit operators. CalTrain boardings would be 41,700 trips under the Aerial Design Option Locally Preferred Alternative (LPA) in 1998, but the 21,700 transfers between BART and CalTrain would include passenger movements in both directions. Therefore, if the assumption is made that transfers from BART to CalTrain would be the same as those from CalTrain to BART, then approximately 15,850 CalTrain riders (of the 41,700 CalTrain boardings) would transfer to BART under the Aerial Design Option LPA in 1998. Please refer to Response 22.6 for further discussion of transfers between BART and CalTrain.

- 25.2. We also note that the September document does not reflect the decisions of the various San Mateo County transportation agencies to study a direct CalTrain ALRS connection. This study has been funded and is underway. This document needs to develop data to reflect that option and the effect on the various alternatives studied.

Response. Please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection.

- 25.3. We still do not find any analysis of the effect of the alternatives on the some 30,000 Airport employees.

Response. Please refer to Response 6.10 for a discussion of SFIA employees accessing the airport and to Response 4.9 for a discussion of connectivity for CalTrain riders accessing the SFIA.

- 25.4. Currently there is a proposal to extend the Airport Light Rail System (ALRS) to the CalTrain right-of-way, which abuts Airport property, and construct a joint CalTrain-ALRS station. The San Mateo County Transportation Authority, the City/County Association of Governments of San Mateo County, SamTrans, and the Peninsula Corridor Joint Powers Board have all adopted resolutions advocating this. Several civic organizations, including San Francisco Tomorrow, have also done so.

Response. Please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection.

- 25.5. Analyses should be made of transit ridership and other impacts with a CalTrain/ALRS station for the following alternatives:

- with CalTrain downtown extension and without BART Airport Extension
- with CalTrain downtown extension and with BART Airport Extension
- without CalTrain downtown extension and without BART Airport Extension
- without CalTrain downtown extension and with BART Airport Extension

Response. Please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection. Analysis of transit ridership under the scenarios listed in the comment is appropriate for the CalTrains-ALRS connection feasibility study.

- 25.6. It is not clear if the patronage and travel times given in Tables 3.1-1, 3.1-3, 3.1-4, 3.1-5, 3.1-6, 6-6, and 6-7 are with or without the CalTrain downtown extension. These figures should be presented for both with and without this extension.

Response. Please refer to Response 9.21 for a discussion of Tables 3.1-1, 3.1-3, 3.1-4, 3.1-5, 3.1-6, and 6-6. Table 6-7, Cost Effectiveness Index, in the FRDEIR/S#2DEIS includes alternatives analyzed in the DEIR/SDEIS and FRDEIR/S#2DEIS that have CalTrain's San Francisco terminus at 4th and Townsend Streets. Analogous versions of most of these tables from the FRDEIR/S#2DEIS are included in the AA/DEIS/DEIR, which examined the BART project alternatives with and without the CalTrain downtown extension. For example, the information in Table 3.1-1 from the FRDEIR/S#2DEIS is contained in Tables 4.2 and 4.3 in the AA/DEIS/DEIR. In addition, information in Tables 3.1-3, 3.1-4, 6-6, and 6-7 in the FRDEIR/S#2DEIS is contained in Tables 4.20, 4.6, 6.20 and 6.22, respectively, in the AA/DEIS/DEIR. The two exceptions are for Table 3.1-5, Daily Trips by Mode to SFIA, and Table 3.1-6, Regional Transit Boardings and Transfers, in the FRDEIR/S#2DEIS. Information on air passenger travel to the SFIA, except by auto, is contained in Table 4.18 of the AA/DEIS/DEIR which is comparable to Table 3.1-5. The number of total transit boardings in the San Francisco Bay Area found in Table 3.1-6 is not contained in the AA/DEIS/DEIR, although the transit person trips from Table 4.6 of the AA/DEIS/DEIR could be used to estimate the transfers per transit person trip presented in Table 3.1-6. The modeling assumptions used in the AA/DEIS/DEIR are consistent with the modeling assumptions used in the DEIR/SDEIS and the FRDEIR/S#2DEIS.

- 25.7. No figures are given for ridership to and from the airport by shuttle van and taxi. This is probably significant and should be included in subject document, along with the effect this project will have on it.

Response. Travel to the SFIA via shuttle van and taxi is included in the auto category of travel volumes in Table 3.1-5, Alternative VI Aerial Design Option Daily Trips by Mode to SFIA, in the FRDEIR/S#2DEIS. The effect of the BART extension on the volumes for the auto category would be a reduction of about 5 percent compared to the No Build Alternative.

- 25.8. The figures given in Table 3.1-5 for airport worker (Work and Other) trips are interesting. They show more of them using BART than using CalTrain. Yet, more airport workers live south of the airport than live north of it. BART does not serve those living south of the airport; CalTrain does. Both CalTrain and BART serve those living north of it. Perhaps the writers of this document assume that the forced transfer from CalTrain to BART for those living south of the airport will discourage use of CalTrain. Further explanation of these figures is in order.

Response. Please refer to Response 6.10 for a discussion of SFIA employees living south of the Airport. Please refer to Response 4.9 for a discussion of connectivity for CalTrain riders accessing the SFIA.

- 25.9. Note 1 to Table 6-6 refers to Table 3.1-8 of this document. There [is] no Table 3.1-8 in this document.

Response. The commentor is correct. Note 1 to Table 6.6 on page 6-10 of the FRDEIR/S#2DEIS is revised as follows:

- The phrase "Table 3.1-8 of this document, and" is deleted from Note 1 of Table 6-6 of Section 6, Financial Analysis.

26. SIERRA CLUB

- 26.1. It has been very frustrating to repeatedly comment on these BART-SFO documents without receiving comments to the questions that we have posed! It looks like BART intends to design the proposed BART-SFO extension project without considering the hundreds of questions that have been asked during the five plus years of hearings and comment periods.

Response. Due to a time lag between release of the DEIR/SDEIS in January 1995 and the FRDEIR/S#2DEIS in October 1995 (see Response 22.12), there has been a delay in responding to comments on the January document. This FEIS/FEIR is the first response to comments document that has been published on this project. This document responds to all comments on both sets of documents, allowing release of a single FEIR/FEIS document.

- 26.2. We are very concerned that both Options B and X will have severe impacts on the endangered species in the wetlands area west of Highway 101. Figure 2 of the FRDEIR/S#2DEIS shows a BART car washer right in the San Felipe-South Lomita Canal-a prime habitat area. We question whether or not adequate mitigation has been proposed, or is even possible.

Response. BART has been in consultation with the USFWS in accordance with Section 7 of the Federal Endangered Species Act. BART and the USFWS developed an approved mitigation program, which included the removal of the car wash from the west of Bayshore area, for identified impacts to the endangered SFGS and threatened California red-legged frog. Details of the mitigation program can be found in Volume I and in the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS. The USFWS concluded in their Biological Opinion that the proposed project, including the proposed mitigation measures, "would not likely jeopardize the continued existence of the SFGS and red-legged frog."

BART has also proposed a mitigation plan as part of its Section 404 permit application to the U.S. Army Corps of Engineers. Details of this mitigation measure are presented in the summary of the Section 404 Mitigation Plan in Volume V of this FEIR/FEIS.

- 26.3. Figure 3.7-2 in the January 1995 Summary DEIR/SDEIS shows the wetlands area south of San Marco Avenue to be a very sensitive habitat area. That is also where BART now proposes to place both the tracks and some support facilities. What additional mitigations have been proposed for this area?

Response. The area south of San Marco Avenue, shown in Figure 3.7-2 of the January 1995 Summary DEIR/SDEIS, is developed and does not contain wetland habitat. Further, Figure 4 of the January 1995 Wetland Delineation Report identifies the area west of San Marco Avenue and east of the Southern Pacific Railroad Tracks (CalTrain) as eucalyptus trees. Patches of freshwater wetland occur west of the CalTrain tracks. Area Du, on Figure 3.7-2 in the DEIR/SDEIS, is upland habitat, and area Dc is the San Felipe portion of the San Felipe–South Lomita Canal. Trapping has indicated that Area Du is not utilized by the San Francisco garter snake, and that Area Dc is used as a spring travel corridor when the canal has water.

Figure 2 of the Design Appendix in the FRDEIR/S#2DEIS indicates that support facilities will be placed in areas which are not considered to be sensitive, so it would not be necessary to implement mitigation measures designed for wetlands and sensitive habitats.

- 26.4. Both Options B and X will have major impacts on the endangered species in the wetlands area and we are concerned that the proposed measures will not adequately protect the endangered species. In particular, the loss of both wetlands and upland habitat may disrupt the breeding and foraging abilities of the wildlife in this area.

Response. Responses 7.12 and 26.2 discuss the steps taken to ensure that the proposed mitigation adequately protects endangered species. Construction plans and mitigation measures have been developed in consultation with the appropriate resource agencies to ensure that all possible required and appropriate measures will be taken to protect onsite endangered species.

- 26.5. The document does not state who will pay for wildlife mitigation and when the mitigation measures will occur.

Response. Wildlife mitigation measures will be funded by BART. The specific nature of each mitigation measure will be determined when it is implemented. The habitat enhancement measures on the west of Bayshore parcel would be initiated prior to construction and continue during and after construction. San Francisco garter snake (SFGS) capture/feeding efforts would, by necessity, occur during project construction; habitat restoration and monitoring would occur post-construction; and the hydrological analysis would be conducted before or during construction. Mitigation monitoring and reporting would assure compliance.

- 26.6. We do not understand the operations purpose of the southern branch of the proposed wye configuration, especially since it will cost \$150-\$200 million and displace over 200 families.

Response. The Millbrae BART/CalTrain/San Bruno Station, as a component of the Aerial Design Option LPA, is rated “high” in the LPA report since it provides an effective addition to the regional transit system. The Millbrae BART/CalTrain Station would meet the objectives of providing intermodal connections and maximizing ridership. The Metropolitan Transportation Commission (MTC) forecasts that the Millbrae BART/CalTrain Station will have a daily patronage of 33,600 in the year 2010. The station would also provide direct access to commuters from the south via the Highway 101/Millbrae Avenue interchange. An intermodal connection at San Bruno would require back tracking for south-side, airport bound passengers. An intermodal connection opposite an airport entrance would provide substantially slower airport access for most riders. It would possibly impact more wetlands, and if needed parking were provided, would further impact wetlands.

The Aerial Design Option LPA would have the benefits of a Millbrae Avenue Station serving both the local Millbrae/Burlingame catchment area and commuters from the south via Highway 101. Stations at Tanforan and Hickey between Highway 101 and I-280 are near the center of San Bruno and South San Francisco. The Tanforan Station, located near I-380, has the benefit of providing an alternative station for commuters from either Highway 101 or I-280. The Millbrae Station alleviates parking pressure on these two stations and increases ridership.

The south leg of the wye into SFIA is the short curved section connecting the straight track of the airport station to the mainline Millbrae. It is essential for the patron connection to CalTrain, is needed for BART operation, and is required for Airport security. The Aerial Design Option LPA provides north and south legs, each with two tracks transitioning off the mainline in an aerial guideway into a three-track, two-platform station directly in front of the west face of the new International Terminal. This design optimizes passenger convenience relative to capital costs.

The south leg has 1,350 feet of double-track guideway and 21 columns. If it were eliminated, the estimated capital cost savings would be on the order of \$20 to \$24 million, which is very minor relative to the overall cost of the extension. If elimination of the south leg would require building the ALRS to the west side, there would be no savings.

Concerning BART operations, the south leg would optimize train movements in and out of the Airport Station to San Francisco and Millbrae. There would be no reverse moves required for normal operations or unexpected movements due to a malfunctioning train. In addition, the full wye would provide for running trains from San Francisco to Millbrae via the Airport Station during low demand periods as non-rush hours, late nights, and weekend service.

Concerning patronage, the south leg of the wye into the SFIA would be essential for SFIA connection to CalTrain.

Concerning Airport screening, the south leg would provide access to Millbrae for off-airport screening of BART passengers and baggage prior to entering the Airport terminal area during periods of heightened security. An Assessment of Security Requirements for the BART facilities on SFIA, to be signed by BART, SFIA, and Federal Aviation Administration (FAA), includes this provision.

In short, passenger convenience, rail operations, and security would be compromised without the south leg, with minimal savings achieved.

- 26.7. Figures 6 and 7 of this FRDEIR/S#2DEIS show the proposed BART tailtrack being built where a grove of Eucalyptus trees now stand. There is a very brief and inadequate comment about this grove on page 3.3-2 under Section 3. The removal of this grove will have negative noise and aesthetic impacts.

Response. Tree removal would be minimized to the greatest extent possible during construction. Although eucalyptus trees would be removed along the east side of the tailtracks, they would remain undisturbed on the east side. In the tailtrack area, eucalyptus trees extend only on the east side of the proposed BART line. These trees are adjacent to industrial uses. Other trees to the west of the BART project, oleander and other small trees, would not be removed. Therefore, the aesthetic effect to residents and other uses west of the project would be minimal.

A row of trees or even a small grove of trees is not an effective noise barrier. A small grove of eucalyptus trees, similar to the situation described, provides virtually no noise attenuation. Studies have shown that it takes a thick forest of trees at least 100 feet deep to produce more than an insignificant reduction in sound.

- 26.8. The TSM alternative has been excluded from most of the tables in this report. Given the fact that MTC resolution 1876 advocates the extension of CalTrain into downtown San Francisco and the fact that the downtown extension is now in the planning stage, it is a gross error for this document to exclude Alternative 2B as a realistic option that Alternative 6 must be compared to. When this document does refer to the TSM alternative, it is not clear whether it is 2A or 2B.

Response. Response 6.8 discusses the CalTrain extension to downtown San Francisco.

As described in Sections 1.2 and 1.3 of the FRDEIR/S#2DEIS, the FRDEIR/S#2DEIS has been prepared to consider only the Aerial Design Option of bringing BART service into the Airport. The Aerial Design Options B and X analyze only a portion of the 1995 LPA (Alternative VI of the DEIR/SDEIS) from south of Angus Avenue in San Bruno to the end of the tailtracks in Burlingame. The FRDEIR/S#2DEIS does not evaluate the segment of the Alternative VI LPA between the Colma BART Station and Angus Avenue in San Bruno. As such, Aerial Design Options B and X are only a portion of the larger Alternative VI LPA. California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) allow the FRDEIR/S#2DEIS environmental analysis to focus only on the differences between the options and Alternative VI. The FRDEIR/S#2DEIS addresses only significant new or different impacts due to the Aerial Design Option and compares them to the Alternative VI tunnel alignment into the Airport south of Angus Avenue.

In addition, as described in Section 1.3, Relationship of this Environmental Document to the DEIR/SDEIS, the FRDEIR/S#2DEIS is a recirculation of the DEIR prepared pursuant to CEQA and a supplement to the DEIS prepared pursuant to NEPA. (This document is a second supplemental DEIS in that it supplements both the AA/DEIS/DEIR and the DEIR/SDEIS.) The TSM Alternative as defined in the DEIR/SDEIS Chapter 2 has no BART extension and no CalTrain extension to downtown San Francisco. In the AA/DEIS/DEIR, however, patronage projections were prepared for both the "A" alternatives with the CalTrain terminus remaining at Fourth and the "B" alternatives with the CalTrain terminus extended to Second and Market.

Section 3.1, Transportation, of the FRDEIR/S#2DEIS, has estimates of transit boardings for the Aerial Design Option LPA and CalTrain with the proposed CalTrain downtown extension. Table ES-2 presents a summary comparison of all of the alternatives, including the TSM Alternative, and is based on the AA/DEIS/DEIR.

- 26.9. We continue to be concerned about the water quality and supply impacts of this proposed project. We understand that the United State Geological Survey and the San Francisco Water Department have been studying the aquifer underlying the corridor from Lake Merced to the Airport in terms of storage capacity for conjunctive use. We do not know if that study has been completed. However, we do wonder if the impacts on water flow have been adequately considered, i.e., concrete box structure restriction on natural seepage and impact on water supply to the users who pump from this aquifer. The long-term impact of this may be profound.

Response. The FRDEIR/S#2DEIS references Chapter 3, Sections 8.2 and 13.2, of the DEIR/SDEIS for mitigation measures to minimize the long- and short-term exposure of local water supplies (underlying aquifers) to contamination.

- 26.10. CEQA is designed to allow decision makers the full range of environmental information, including comments and Responses from organizations and individuals, prior to making any real decisions on proposed projects. BART appears to be undermining the intent of the CEQA process by planning the project first and justifying the environmental impacts of design changes after the fact. Not responding to agency, organization, and individual comments is insulting to the commentors, to the process, and to the law! We strongly encourage a more open and respectful approach, if year of litigation are to be avoided.

Response. Please refer to Response 22.12 for a discussion of the process of responding to public comments.

- 26.11. We consider this report as inadequate and as difficult to understand as the previous BART-SFO reports.

Response. The commentor's remarks are noted. This document was written in the same manner and with the same diligence as the DEIR/Technical Appendix. The environmental impact review process

for the BART–San Francisco Airport Extension has been a long and arduous one due to the complexity and size of the project itself. The information and analysis contained in this document satisfy the standards and requirements of both the California Environmental Quality Act and the National Environmental Policy Act.

- 26.12. We continue to support Alternative 2B - the TSM Alternative with express bus service from Daly City BART to San Francisco Airport, in conjunction with the extension of CalTrain into downtown San Francisco.

Response. The commentor's support for Alternative II, Transportation Systems Management (TSM), is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA and the implications of the BART project for future CalTrain service and improvements. Please also refer to Response 22.1 of this FEIR/FEIS for a discussion of the proposed alternatives and upgrades to CalTrain considered in the *CalTrain San Francisco Downtown Extension/System Upgrades Final Report*, March 1994. Please also refer to Response 6.8 for a discussion of the study of the CalTrain extension to downtown San Francisco.

27. SOUTH BAY HISTORICAL RAILROAD SOCIETY

- 27.1. It is stated in the BART–San Francisco Airport Extension DEIR/Technical Appendix -- Cultural Resources/Alt. VI3.4-34, that the relocation of the Millbrae Railroad Station would be a significant effect. A far greater effect will be the abandonment of use and isolation of the Station caused by the relocation of the passenger loading platform several hundred feet to the north-west, on the other side of Millbrae Avenue (FRDEIR/S#2DEIS -- Aerial Design Option X or B, Figure 6). This effect has not been mentioned in the DEIR and needs to be addressed in the Final EIR. The historical significance of this structure is its use as a railroad station and mitigations will need to be developed for this highly significant adverse effect.

Response. Further engineering performed since preparation of the FRDEIR/S#2DEIS has led to the decision that the Millbrae Avenue Station would not be moved as originally stated in the document. Though the center of the passenger loading platform would be shifted north to be incorporated into the new Millbrae BART/CalTrain Station north of Millbrae Avenue, the platform would still extend south of Millbrae Avenue, to a distance approximately 100 feet north of the historic Millbrae CalTrain Station. CalTrain patrons would still be expected to use the historic station site for boarding CalTrain.

The National Register of Historic Places Inventory Nomination Form for this property indicates that its setting is not a contributing element in its National Register status and that the property consists of only the building on a small (62 by 94 feet) plot. Nonetheless, the project design ensures that the urban- and transportation-related setting of the property would not be significantly altered. The commercial uses of the station would remain and transit users would still be expected to use the station. For these reasons, the station would not be "adversely affected" by the shift in location of the platform.

- 27.2. We would also like to comment on the arched, cut-stone bridge in South San Francisco (BART–San Francisco Airport Extension DEIR/Technical Appendix -- Cultural Resources 3.4-10). As one of the few structures still in existence from the San Francisco–San Jose Railroad it is extremely significant. The San Francisco–San Jose Railroad was the second railroad line completed in the State of California (1863). It is stated in the DEIR/Technical Appendix -- Cultural Resources/LPA 3.4-17, that "the bridge is a significant example of engineering history". We would like to state that it is also a significant example of railroad history, and request that the mitigations developed address this fact.

Response. The comment regarding the role of the arched, cut-stone bridge in the history of California's railroad industry is noted. BART would work with the City of South San Francisco to explore all alternatives regarding the cut-stone bridge, and the City of South San Francisco will be a signatory to any Memoranda of Understanding (MOU) that addresses mitigation for the bridge. One of the proposed mitigation measures is to provide an historical bridge marker that addresses the bridge's role in engineering and railroad history. The bridge will be recorded as part of the National Park Service's Historic American Engineering Record, and the headwall will be dismantled and reassembled. In addition, a concrete bridge replica will be constructed. See Volume V of the FEIR/FEIS for the complete Finding of Effect and the signed MOA regarding the bridge.

3.5 INDIVIDUALS AND BUSINESSES

28. ABTELHALIM, SUHAIL

- 28.1. I like to see BART coming to Millbrae.

Response. The commentor's support for the BART–San Francisco Airport Extension is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

29. ALLEN, ROBERT

- 29.1. BART to SFO will be much cheaper and much better if:
- A. The line from Colma to San Bruno is at grade;
 - B. The line from I-380 through Millbrae is west of CalTrain;
 - C. CalTrain and BART share a common grade south of I-380
 - D. All streets cross on overpasses or in underpasses;
 - E. The south leg of the wye into SFO is eliminated; and
 - F. CalTrain/SFO transfers occur in San Bruno, not Millbrae. Savings would be in the order of hundreds of megabucks. Many months could be saved by eliminating several miles of unnecessary tunneling.

Response. While the commentor is correct in stating that an at-grade BART alignment from Colma to San Bruno would be less expensive than some other construction methods, there are a number of reasons for not considering an at-grade alignment.

At-grade construction of BART tracks south of the Colma extension is feasible only in limited portions, as described below:

Colma Cemeteries (Colma to Mission Road). Much of the SPTCo right-of-way is only 60 feet wide, and some has been sold to the cemeteries. BART does not have the right to condemn cemetery property under California law. The Colma Cemetery Coalition will sell BART the additional property required for subway construction only in this reach.

Mission Road to Chestnut Avenue. It is feasible for BART to cross under Mission Road. However, south of Mission Road, at-grade construction is not feasible due to the constrained space for access and traffic circulation on two new crossing roadways at the proposed Hickey Station.

In addition, the Hickey Station area is in the 100-year floodplain. At-grade construction in this reach would reduce the area of the floodplain and would modify the existing flow patterns.

South of the Hickey Station, the 100-year floodplain continues and a major crossing of Colma Creek occurs. Throughout this reach, subway construction is the most feasible to provide traffic access and circulation at Hickey Station and to avoid encroachments on the 100-year floodplain. Another feasible alternative is to use aerial structure, which would achieve the same benefits at lower costs but would create a visual barrier and restrict the future use of the property. The City of South San Francisco has resisted an aerial structure due to these concerns.

Chestnut Avenue to South Orange Avenue. At-grade construction is possible in this area, but is limited due to a crossing with Twelve Mile Creek, major noise and vibration mitigations for apartments on both sides, visual and noise mitigations at Orange Park, and the need to purchase the Boys & Girls Club at South Orange Avenue. Subway is the most feasible for these reasons. Aerial is also feasible, except near Orange Avenue, as discussed for the Mission Road to Chestnut Avenue reach.

South Orange Avenue to South Spruce Avenue. This area has a school on the south side near Orange Avenue and a row of houses to the north facing Myrtle Avenue, all very close to the narrow BART right-of-way. Noise and/or vibration mitigations will be required regardless of the type of construction.

At-grade construction in this area is possible with the use of sound walls, vibration damping track, and the creation of a visual barrier through the neighborhood.

Subway is the most feasible, however, to minimize these impacts on the neighborhood. Another feasible alternative is aerial construction, as discussed for the Mission Road to Chestnut Avenue area. The aerial construction has a significant benefit at the South Spruce Avenue crossing to avoid a deep subway crossing due to adjacent waterways.

South Spruce Avenue to I-380. The Aerial Design Option LPA alignment requires a subway station at San Bruno/Tanforan under the shopping center and city streets. The most feasible alternative would be all subway, with possible short sections of open retained cut or an aerial crossing of South Spruce, with a transition to subway into the San Bruno Tanforan Station. At-grade construction is not possible in this area due to the above constraints.

I-380 to the Portal Near Cupid Row. At-grade construction is not possible in this area due to road crossings at Herman, San Bruno, San Mateo, and Angus Avenues. The most feasible alignment in this reach is subway to minimize the impacts on the San Bruno business district. Another feasible alternative is an aerial structure that would achieve the same benefits at a lower cost, but would create a visual barrier and restrict the future use of the surface area. The City of San Bruno has resisted an aerial structure due to these concerns.

Portal Near Cupid Row to Portal Near Center Street. At-grade construction is specified in this area in the approved LPA alignment.

Portal Near Center Street to Portal Near Millbrae Station. BART is located on the east side of the CalTrain right-of-way, with street crossings at Center Street and a future crossing at Hillcrest Boulevard. Homes facing Aviator Avenue are very close to the BART tracks and will require noise and/or vibration mitigations regardless of the type of construction.

A very short section of at-grade construction is possible between the two street crossings, with steep profile grades at each end. Subway is the most feasible in this section to minimize the impact on the neighborhoods and to provide a more uniform profile grade for train operations.

Millbrae Station and Tailtrack. At-grade construction is specified for this area in the Aerial Design Option LPA alignment.

The at-grade alternative described by the commentor would require several grade separations at street crossings through Colma, South San Francisco, and San Bruno. These separations would be necessary due to the street configurations in these cities and safety issues surrounding the BART systems third rail. In addition, an at-grade alignment would require a substantially greater number of real estate acquisitions to deal with loss of access to businesses and residences where the street must be raised. For example, the San Bruno Grade Separation Study Technical Memorandum, prepared for the AA/DEIS/DEIR, estimated that under a BART and CalTrain at-grade alignment with San Mateo and San Bruno Avenues lowered under BART/CalTrain, ten commercial and six residential properties would need to be acquired at this intersection. In addition, businesses located east and west of the BART/CalTrain alignment and fronting San Bruno Avenue would have their vehicle and pedestrian access impaired or eliminated due to the lowering of San Bruno Avenue and construction of retaining walls, thus requiring additional acquisitions.

It is true that an at-grade system operated successfully along this existing corridor over 100 years ago; however, the Peninsula corridor has changed and developed substantially since 1864. An at-grade system is not a feasible operating configuration for BART due to safety considerations. BART must consider the safety requirements necessary to secure BART's right-of-way and high-powered third-rail from autos, pedestrians, etc. BART's enclosed trackway would impede the crossing of major thoroughfares throughout the Peninsula if it followed the commentor's suggested path down the Southern Pacific Transportation Company (SPTCo) corridor.

In addition, an at-grade configuration is also undesirable from a community standpoint, particularly through the cemetery properties and the City of San Bruno.

Need for the Millbrae Station. The Millbrae BART/CalTrain/SamTrans Station as a component of Alternative VI is rated "high" in providing an effective addition to the regional transit system. The Millbrae BART/CalTrain Station meets the objectives of providing intermodal connections and maximizing ridership. The Metropolitan Transportation Commission (MTC) forecasts that the Millbrae BART/CalTrain Station will have a daily patronage of 33,600 in the year 2010. The Millbrae BART/CalTrain Station also provides direct access to commuters from the south via the Highway 101/Millbrae Avenue interchange.

The Aerial Design Option LPA has the benefits of a Millbrae Avenue Station serving both the local Millbrae/Burlingame area and commuters from the south via Highway 101. Stations at Tanforan and Hickey Boulevard between Highway 101 and I-280 provide the cities of San Bruno and South San Francisco with access in a central commute corridor. The Tanforan Station, located near I-380, has the benefit of providing an alternative station for commuters from either Highway 101 or I-280.

Need for the South Leg of the Wye Under the Aerial Design Option LPA. The south leg of the wye into the SFIA is essential for the commuter connection to CalTrain and is needed for BART operation and airport security. The Aerial Design Option LPA provides north and south legs, with two tracks each transitioning off the mainline in an aerial guideway into a three-track, two-platform station directly in front of the west face of the new Airport International Terminal. This design optimizes passenger convenience relative to capital costs.

If the south leg were eliminated from the Aerial Design Option LPA, the estimated capital cost savings would be \$20 to \$24 million, which is insignificant relative to the overall cost of the extension. 1,350 feet of double-track guideway and 21 columns would be eliminated. The balance of the BART facilities east of Highway 101 are essential to BART operations irrespective of the elimination of the south leg of the wye.

The current design provides for efficient train movements into and out of the Airport Station from San Francisco and to Millbrae. There are no reverse movements required for normal operations or unexpected movements due to malfunctioning trains. In addition, the full wye provides for running trains from San Francisco to Millbrae via the Airport International Terminal Station during non-rush-hour periods, late nights, and weekends.

The ability to provide an off-airport screening of BART passengers and baggage is an essential feature of BART rail service into the SFIA. An Assessment of Security Requirements for the BART facilities on the SFIA will be signed by BART, the SFIA, and the Federal Aviation Administration, and will include this provision.

The south leg is essential to the overall operations of the BART extension into the SFIA. Every aspect of BART service, including passenger convenience and rail operations, would be comprised without the south leg. In addition, the cost savings attributed to elimination of the south leg are minimal compared to the overall cost of the extension or provision of an alternative means of access (extension of the ALRS) to the SFIA from the Millbrae Station.

Community Support. The development of community support for BART has been an arduous process. Final acceptance of the BART alignment is based on developing community consensus in the preliminary engineering stage. This process is covered in Chapter 1 of the Summary DEIR/SDEIS (January 1995). The Summary DEIR/SDEIS states, in part, that the most recent re-initiation of BART to the Peninsula occurred in 1984 and 1985. As a result of this study, the Federal Transit Administration authorized the funding for an Alternatives Analysis/DEIS/DEIR study. The following studies define the basis of the current alignment: AA/DEIS/DEIR, March 1992; Summary DEIR/SDEIS, January 1995; FRDEIR/S#2DEIS, September 1995.

30. AMSTRUP, IRV

- 30.1. Where is the traffic study for Trousdale Drive - and Burlingame Village? We have 3 schools + 3 hospitals + a police station affected.

Response. Please refer to Response 7.6 for a discussion of traffic impacts on Trousdale Drive as well as on Millbrae Avenue and Murchinson Avenue. Burlingame Village was assumed to comprise the area bounded by Murchinson Drive, California Drive, Mills Avenue, and El Camino Real. The volume of BART-related traffic during the critical peak hour would not result in significant congestion nor noise impacts for homes and institutions along Trousdale Drive or in Burlingame Village. The intersections of El Camino Real/Murchison, El Camino Real/Trousdale, and California/Murchison, which are in Burlingame Village, were analyzed and no significant traffic impacts were found under any of the project alternatives. Response 6.58 provides further details on activities to be performed along the tailtracks and the impacts associated with those activities.

31. AMSTRUP, KAY G.

- 31.1. Noise, traffic, safety concerns of Burlingame have not been addressed.

Response. Noise impacts, including any in Burlingame, are addressed in Chapter 3, Section 9.2, Noise and Vibration Impact Assessment and Mitigation, of the FRDEIR/S#2DEIS. Traffic impacts are addressed in Chapter 3, Section 1.3, Traffic Impact Assessment and Mitigation, of the FRDEIR/S#2DEIS. Intersections in Burlingame were analyzed, and the results included in the FRDEIR/S#2DEIS. In Appendix Table B, Alternative VI Aerial Design Option Intersection Level of Service, of the FRDEIR/S#2DEIS, Broadway/Rollins is listed as intersection number 135, Broadway/California is intersection 134, Broadway/El Camino Real is 133, Trousdale/El Camino Real is 130, and Murchison/El Camino Real is 127. In addition, the following two intersections in Millbrae are in close proximity to Burlingame: Millbrae Avenue/El Camino Real (number 72) and Millbrae

Avenue/Rollins (number 80). Safety concerns are addressed in Chapter 3, Section 5.2, Community Services and Facilities, in the FRDEIR/S#2DEIS. Please note that these issues are also addressed in Chapter 3 of the Summary DEIR/SDEIS for the other alternatives examined.

31.2. Electrify/improve CalTrain to S.F. Let BART go to airport. Period.

Response. The commentor's support for both the BART–San Francisco Airport Extension and the extension/improvement of CalTrain is noted. Public input regarding the merits of the different BART alignment alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Response 22.1 for a discussion of the alternatives and upgrades to CalTrain considered in the *CalTrain San Francisco Downtown Extension/System Upgrades Final Report*, March 1994 and to Response 6.8 for a discussion of the study of the CalTrain extension to downtown San Francisco.

32. ARTICHOKE JOE'S

32.1. The DEIR and supplemental DEIR indicate that BART will carry approximately 4% to 5% of airport traffic....When the number of BART-Airport trips (10,300) is divided by the total number of airport-related trips (191,200), it becomes evident that in 1998 BART will carry only 5.4% of the total airport traffic. This calculation is based on BART's figures. If the Airport's figures are used, the percentage drops even lower....If we divide BART's 1998 forecast of 10,300 airport passengers by the Airport's forecast of 239,758 daily airport trips in 1996, we see that BART will only be carrying 4.2% of the airport's overall traffic. The stark reality is that this project will carry a small fraction of airport-bound traffic. That fact should be stated clearly in the final EIR/EIS so the public can determine how best to allocate scarce resources. The relative percentage of traffic to be carried is highly pertinent to a project that will cost will in excess of \$1 billion and the public may well decide to forego this expenditure and pursue something more cost-effective given the relatively minor role this project will play in transporting airport traffic.

Response. The number of trips by mode to the SFIA for every alternative examined is presented in the FRDEIR/S#2DEIS in Table 3.1-5, Alternative VI Aerial Design Option Daily Trips by Mode to the SFIA, as well as in the DEIR/SDEIS and the AA/DEIS/DEIR. In 1998, the percentage of transit trips to the SFIA, including trips by BART, CalTrain and bus, would increase from 9.8 percent under the No Build Alternative to 14.1 percent under the Aerial Design Option LPA. Given the projected growth for the SFIA, improving transit service to the airport is important to maintaining mobility in the Bay Area. Whether the BART–San Francisco Airport Extension provides service to the airport is one of many objectives that will be used to judge each alternative studied. In addition, the cost effectiveness of providing that service will also be evaluated.

The BART–San Francisco Airport Extension would serve travel markets other than the SFIA. According to Table 3.1-3, BART Daily Patronage By Station, of the projected 68,600 average daily passengers using a BART extension station under the Aerial Design Option LPA in 2010, 17,800 passenger trips would be trips to or from the airport, and 50,800 or 74 percent would be non-airport related trips. A key benefit of the BART extension would not only be the total daily number of BART passengers going to the airport, but the number of BART patrons during the peak hour of roadway congestion. Highway 101 near the SFIA carries approximately 7 percent of its total daily traffic during the peak hour, whereas transit in the Bay Area typically carries 15 to 16 percent of its trips during the peak hour. For the critical peak hour, the net beneficial impact of the BART–San Francisco Airport Extension would be approximately twice the benefit BART provides on a daily-trip basis.

32.2. The Supplemental DEIR is deficient in that it does not reveal these facts in a clear manner. The only way the public can learn them is to rake the various technical tables with a fine-tooth comb and do the

arithmetic. The facts should be stated in plain English, rather than being embedded in a wall of scientific jargon and complicated statistics.

Response. The commentor's objection to the language and use of statistics in the FRDEIR/S#2DEIS is noted. This document was written in the same manner and with the same diligence as the DEIR/Technical Appendix. The large volume of technical information contained in the FRDEIR/S#2DEIS is a direct reflection of the complexity and size of the project itself. The format is presented in the clearest manner possible and is consistent with the requirements of the report. The large volume of information necessitates presentation of quantitative data in a tabular format. The information and analysis contained in this document satisfies the standards and requirements of both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

- 32.3. What is the relative cost of constructing a single station, west of Highway 101, which will allow all passengers to transfer to the planned Airport light rail system (ALRS)?

Response. Please refer to Response 16.3 for a discussion of the capital cost information provided in an environmental document.

- 32.4. Such a transfer [from a station west of Highway 101] will allow all patrons equal access to SFO. Everyone will make a single transfer, and will be dropped off directly in front of their terminal of choice. This connection is of particular importance to the thousands of airport employees who live south of the Airport. Indeed, according to Table 3.1-1 in the Technical Appendix to the January 1995 DEIR, over 56% of all airport employees live south of the airport. If they are going to utilize rail transit, they will have to ride CalTrain and then transfer to the ALRS. A single transfer point is much easier for them than the "two-transfer" system proposed in the Supplemental DEIR, yet it isn't analyzed. It should be fully discussed in the final EIR.

Response. Please refer to Response 4.9 for a discussion of connectivity for CalTrain riders accessing the SFIA. Please also refer to Response 6.10 for a discussion of SFIA employees commuting from south of the airport.

- 32.5. We are aware of the argument that to make transit patrons transfer is to discourage their ridership....The inescapable fact is that virtually all riders on this system, however constructed, will have to transfer. Even within the BART system itself, riders will have to transfer to get on an Airport-bound train. Only one in three trains will be going to the airport (Supplemental DEIR at page 2-18); also, a rider from Fremont or Richmond will be required to transfer in Oakland to board a San Francisco Bound Train. Even riders on an Airport-bound train will likely have to transfer to the ALRS upon reaching the Airport. The only people who will be walking to their airplanes will be those who ride in the front of the train. People who must exit from the middle and rear of the trains will...[likely] choose to utilize the light rail system to get to the nearest terminal. And if they are destined for any terminal other than the nearest concourse, they will most certainly have to transfer to the ALRS, because their destination will be thousands of feet away....BART has created a myth that this will be a "seamless" system, in which riders will not transfer. People will indeed be transferring. While it is important to keep the number of transfers to a minimum, it is vastly more important to conserve money if this project is ever going to be built.

Response. The planning assumption made for operating characteristics to forecast patronage was that one of every three trains serving the BART extension stations would go directly to the Airport International Terminal during peak hours under the Aerial Design Option LPA. Every train serving the BART extension stations during off-peak hours would go directly to the Airport International Terminal, as reflected in the "X" schedule. This off-peak schedule would involve all southbound BART trains traveling from the Tanforan Station into the SFIA, and then to the Millbrae Avenue Station, and all northbound BART trains traveling from Millbrae to the SFIA, and then to San Bruno.

When the Passenger Service Quality Standards were developed and later adopted by the San Francisco Airports Commission, the walking distances were based on mid-platform distances, not on people riding in the front of the train. People with destinations at the new International Terminal and the North Terminal would be able to walk to these location (and meet the Passenger Service Quality Standards), or could choose to use the Airport Light-Rail System (ALRS). Approximately two-thirds of the riders would be within walking distance (refer to Response 16.51 for a detailed discussion). Under the Aerial Design Option LPA, individuals deciding to take transit to the SFIA would be able to access terminal destinations from the BART Airport International Station, even if the ALRS were not functioning.

- 32.6. If one station can be built instead of three and create "transfer equity" among patrons, it should be discussed fully as an alternative and the costs compared in a clear fashion to the public can easily access the data and decide for itself which alignment it prefers.

Response. Please refer to Response 32.7 for a discussion of transfer equity. The capital costs, operating and maintenance costs, transportation effectiveness, and the cost-effectiveness index are shown in Table 6-10 in Chapter 6, Financial Analysis, of the DEIR/Technical Appendix for Design Option V-B and Alternative VI, and in the same chapter of the FRDEIR/S#2DEIS for Aerial Design Options X and B. Design Option V-A, with one station south of the Hickey Station (either I-380 San Bruno or Downtown San Bruno), and Alternative VI, with three stations south of the Hickey Station (Tanforan, Airport International Terminal subway, and Millbrae Avenue), are discussed fully in the DEIR/Technical Appendix. Aerial Design Options X and B, with three stations south of the Hickey Station (Tanforan, Airport International Terminal aerial, and Millbrae Avenue), are discussed fully in the FRDEIR/S#2DEIS.

As presented in Chapter 6, the cost effectiveness of Design Option V-B with the I-380 San Bruno Station is \$19.84 per new transit rider. This compares to \$28.76 for Alternative VI, \$26.32 for Option B, and \$26.12 for Option X.

The capital cost effectiveness of individual stations is not presented in Chapter 6 of either the DEIR/Technical Appendix or the FRDEIR/S#2DEIS. It is inappropriate to apply cost effectiveness to one element of an alternative, such as either the Hickey or the Tanforan Station. Cost effectiveness is appropriately applied to an entire alternative and its set of stations, not a single station or set of stations.

- 32.7. The facts on this [transfer equity] issue are well hidden in the environmental documents. For example, in Table 3.1-4 of the January 1995 DEIR, we learn that in the year 2010, Alternative V-B (which entails a single station in downtown San Bruno) will carry 92,500 patrons to the Airport, to Northern San Mateo County and to Downtown San Francisco. We also learn that in the same year, Alternative VI -- which costs half a billion dollars more -- will only carry 92,200 patrons to those same places. Option X, which is now BART's preferred alternative, bears striking similarity to the ill-fated Alternative VI: it, too, costs far more than Alternative B-B -- \$250 million more -- and it carries fewer patrons (approximately 400 fewer per day than Alternative VI).

Response. The commentor is addressing tables from the Summary DEIR/SDEIS rather than the FRDEIR/S#2DEIS. Table 3.1-4 of the Summary DEIR/SDEIS, Transit Utilization by Geographic Area, does not present transit patronage for all destinations, but instead compares transit utilization by alternative for three important destinations. Table 3.1-4 contains no totals for these three geographic areas because such totals are not meaningful. Table 3.1-2 of the Summary DEIR/SDEIS, Regional Daily Transit Operator Boardings, presents the totals for BART boardings and the changes from the No Build Alternative. The increase in daily BART boardings compared to the No Build Alternative in 2010 would be 39,900 boardings under Design Option V-B, and 43,000 boardings under Alternative VI. Table 3.1-2 of the FRDEIR/S#2DEIS, Alternative IV Aerial Design Option Daily Transit Operator Boardings, reveals that BART boardings would increase by 42,000 under the Aerial Design Option

LPA compared to the No Build Alternative in 2010. The daily BART patronage for San Mateo County in 2010 would be 86,500 patrons under Design Option V-B, 99,400 patrons under the Alternative VI LPA, and 98,100 under the Aerial Design Option LPA.

- 32.8. The January 1995 DEIR also reveals that the various “build” alternatives have approximately the same impact when it comes to reducing automobile traffic. See Table 3.1-6 to the January 1995 DEIR (the number of automobile trips is essentially the same for all “build” alternatives). The final EIR should make clear what is buried in these tables: Alternative VI and the aerial alignment are too expensive, and do not transport more people to the critical locations, nor do they provide any special relief from vehicular traffic. In short, they aren’t worth the money.

Response. The commentor is addressing tables from the DEIR/SDEIS, rather than from the FRDEIR/S#2DEIS. The reduction in daily auto trips is similar for all BART build alternatives. Each of the BART build alternatives, including the Aerial Design Option LPA, would decrease daily auto trips to the airport by over 10,000 trips in the year 2010. According to Table 3.10-5 of the Summary DEIR/SDEIS, Regional Vehicle Miles Traveled and Associated Air Emissions, daily vehicle miles traveled would be reduced by 484,811 miles in 2010 under all of the BART build alternatives, as compared to the No Build Alternative. An advantage of BART build alternatives with end-of-line stations south of the SFIA, such as the Alternative VI LPA and the Aerial Design Option LPA, is that traffic would be decreased on Highway 101 south of the airport. The airport is a substantial trip destination, and Highway 101 tends to have traffic congestion on either side of the ramps to the SFIA. The commentor has not defined critical locations. The Aerial Design Option LPA would serve many important destinations at the SFIA, as well as in San Mateo, San Francisco, Alameda, and Contra Costa counties.

- 32.9. The Supplemental DEIR does not discuss the proposed connection between the planned Airport light rail system (the “ALRS”) and the existing CalTrain system. The CalTrain-ALRS connection, if completed, would provide a direct transfer point for CalTrain passengers so they can gain easy access to airport facilities.

Response. Please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection.

- 32.10. [A CalTrain-ALRS] connection can be built largely, if not entirely, at the Airport’s expense, as outlined in the Final Traffic Mitigation Plan adopted by the Airports Commissions in connection with the environmental certification of the Airport’s current \$2.5 billion expansion program. (Specifically, as a mitigation measure, the Airport committed up to \$120 million to connect the ALRS system to a CalTrain station west of Highway 101.) The total cost of the light rail system is estimated to be \$44 million (this was the figure used by BART in its January 1995 DEIR); we understand from Airport staff that the cost to connect the ALRS to CalTrain is a fraction of the total, and is in the neighborhood of \$16-17 million.

Response. It is possible that the SFIA could connect a CalTrain station west of Highway 101 to the terminal area with an ALRS extension. However, such a construction project is neither planned nor funded in the Master Plan project now under way.

If the airport were to contribute \$120 million to the CalTrain-ALRS station or an access route, no funds would be available for the traffic improvements also discussed in the Traffic Mitigation Plan, which cities are interested in having developed.

The DEIR/SDEIS does not state that the cost of the entire ALRS would be \$44 million, but instead states clearly that \$44 million is the estimated cost of the connection between the ALRS terminal loop and a station west of Highway 101. The estimate was developed in conjunction with SFIA staff. BART is not aware of other cost estimates given to other parties.

- 32.11. The CalTrain-ALRS link stands in sharp contrast to the present BART proposal, which not only costs upwards of a hundred times the money, but also requires CalTrain riders to transfer twice -- once to get from CalTrain to the Millbrae-to-Airport BART segment (the southern portion of the so-called "wyé"), and then again when they exit the BART train and switch to the ALRS in order to get to their final destination at the Airport.

Response. The travel time to various destinations within the airport would be very similar among the BART build alternatives. Under Alternative VI, individuals traveling from the north would ride a BART train to the International Terminal at the SFIA and then either walk to their airport destination or transfer to the ALRS. Individuals traveling on CalTrain from the south to the SFIA would, under the Aerial Design Option LPA, transfer to BART at the Millbrae Avenue Station and ride BART to the Airport International Terminal Station. These riders from CalTrain would again either walk to their airport destination or transfer a second time to the ALRS.

Of those persons traveling on BART to the SFIA, about 10 percent would require the double transfer from CalTrain to BART and then to the ALRS under the Aerial Design Option LPA. Individuals traveling from the south on CalTrain would need to ride to San Bruno before transferring to the transit system that would take them to the airport, rather than transferring at Millbrae, which would save several minutes.

The ALRS would be a double-loop system in which the inner loop would service the airline terminals and the outer loop would serve the terminals as well as remote locations. If a person wished to travel to the remote locations, a direct CalTrain-ALRS link would save one transfer, as the commentor observed, because the outer loop would be the connecting link to CalTrain. Depending on the outer loop's route, the remotely destined passenger may be subject to stopping at each terminal before reaching the remote location. Thus, the overall time spent en route may be about the same, because ALRS headways are reported to be three minutes.

- 32.12. A direct CalTrain-ALRS connection is vital for airport workers, the vast majority of whom live south of the airport and who will have to take CalTrain to the Airport if they are to utilize rail transit to get them to work. If we want to get these workers out of their cars and onto a train, we must provide them with a convenient system that incorporates a minimum of transfers. The CalTrain-ALRS connection does just that.

Response. Please refer to Response 6.10 for a discussion of SFIA employees living south of the Airport. Please refer to Response 4.9 for a discussion of connectivity for CalTrain riders accessing the SFIA.

- 32.13. The CalTrain-ALRS connection is the inter-modal connection preferred by all local San Mateo government agencies, as expressed in formal resolutions adopted by: SamTrans, Peninsula Joint Powers Board,...San Mateo Transportation Authority,...and City/Council Association of Governments of San Mateo County. Copies of the resolutions adopted by these agencies are attached to these comments as Exhibit 1.

Response. Please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- 32.14. The San Mateo Civil Grand Jury concluded that CalTrain can be upgraded to provide transit service equivalent to BART's proposed extension, but at a fraction of the cost.

Response. Numerous studies that have examined the home-to-work travel patterns have confirmed the existence of two transit markets in San Mateo County: a northwest county market with a large proportion of work trips directed to San Francisco, and a Bayside transit market also oriented toward San Francisco, but with a growing number of work trips being made to the south, including the San

Jose area. The SamTrans Century Plan, adopted by the Board of Directors in 1985, encompasses the transit strategy to address both these markets. MTC officially recognized this strategy in 1988 with adoption of Resolution No. 1876, which designated the BART–San Francisco Airport Extension and the CalTrain downtown extension as two of the three projects in the New Rail Transit States and Extensions Program for the nine-county Bay Area. The two-corridor concept was twice submitted to the San Mateo County voters via countywide ballot. Each time both rail projects won resounding voter approval.

Please also refer to Response 32.72 for a discussion of the grand jury’s conclusion.

- 32.15. To totally ignore the [San Mateo County Grand Jury Report regarding the] potential CalTrain-ALRS connection in the Supplemental DEIR -- particularly when we take into consideration that it will be cheaper and more convenient -- violates both the letter and spirit of both CEQA and NEPA and cannot pass a “rule of reason” analysis as an adequate discussion of reasonable project alternatives. It must be discussed fully in the final EIR/EIS. (At a bare minimum, the CalTrain-ALRS connection would seem to make the southern portion of the “wy’e” alignment unnecessary.)

Response. The DEIR/SDEIS and the FRDEIR/S#2DEIS together evaluate and compare all reasonable project alternatives. The FRDEIR/S#2DEIS was prepared solely to evaluate two design options to Alternative VI and is focused only on the segment of Alternative VI south of Angus Avenue in San Bruno to the end of the tailtracks in Burlingame. All significant impacts associated with these two design options were identified and mitigation proposed. The information and analysis in these documents satisfy the standards and requirements of both California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA). Please refer to Responses 32.14 and 32.27 for a discussion of the grand jury report. Please also refer to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- 32.16. NEPA requires the consideration of “connected actions” which are defined to include actions that “are closely related and therefore should be discussed in the same impact statement.”...The fact is that BART, CalTrain and the ALRS are interrelated and hence, “connected” for NEPA purposes. That is to say, ultimate decisions on CalTrain and the ALRS will be affected by the BART Airport Extension, and vice versa; the plan is to have riders transferring between these systems and to say they are not “connected” for NEPA purposes is to strip language of all meaning. Given the applicable NEPA regulations, the failure to adequately discuss the “connectivity” between CalTrain and the ALRS in the Supplemental DEIR is a flaw that must be corrected.

Response. Please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- 32.17. The entire BART extension is heavily dependent upon CalTrain riders transferring to BART at Millbrae for a commute into downtown San Francisco. This fact appears in Tables 3.1-2 and 3.1-5 of the January 1995 DEIR, which states that by year 2010, 19,900 CalTrain riders will transfer each day to BART at the Millbrae station (at present there are only 20,800 daily CalTrain riders; 36,500 are forecast for year 2010)...Where do these figures come from?...How can BART predict that so many people will make this transfer?...Why would CalTrain riders switch to BART? By transferring, they will be required to: a) pay another fare; b) ride a train that travels a longer geographic route than the present CalTrain line; and c) endure a slower ride to San Francisco.

Response. Please refer to Response 22.6 for a discussion of transfers between CalTrain and BART. Decisions on fares, including fares involving transfers between BART and CalTrain, would be made by the JPB and SamTrans boards in conjunction with the BART Board. Please refer to Response 6.11 for a discussion of travel time on BART as compared to CalTrain.

- 32.18. We seriously doubt this [CalTrain-to-BART transfer] will ever occur, particularly considering the fact that there are plans [Peninsula Joint Powers Board Design Options Screening Report,...September 1995] on the books to move the San Francisco CalTrain terminal so that it is located in the heart of the downtown area?

Response. Table 3.1-7, Daily Intermodal Transfers Between Rail Services, in the FRDEIR/S#2DEIS includes transfer volumes between CalTrain and BART with and without the CalTrain downtown extension that address this impact. Transfers between CalTrain and BART are estimated to be 24,100 under the Aerial Design Option LPA without the CalTrain downtown extension in 2010, and 11,800 under the Aerial Design Option LPA with the CalTrain downtown extension in 2010. Please also refer to Response 6.8 for a discussion on the CalTrain Downtown Extension.

- 32.19. What is the impact of this project on the CalTrain Downtown Extension Project? Will both be built? Can both be funded? Does the construction of one jeopardize the other?

Response. Please refer to Response 32.14 for a discussion of support in San Mateo County for both the BART extension and the CalTrain downtown extension. If both projects were to be built, federal funds for CalTrain would be derived from Rail Modernization funds, while federal funds for the BART-San Francisco Airport Extension would come from the New Starts program. The funds are separate funding categories directed toward different transit programs and thus construction of one project would not jeopardize federal financing of the other.

- 32.20. Given the limitations on funding, it is essential that the public receive all the pertinent facts so a responsible and informed debate can occur, followed by a reasoned decision, as to which project to pursue; which one should be accorded priority; and whether the pursuit of one will imperil the other.

Response. Please refer to Response 22.12 for a discussion of the environmental review process.

- 32.21. The funding concerns are real. In June of 1995, the House Appropriations Committee instructed BART to cut costs on this project and warned that future increases in federal funding should not be anticipated; a similar message was delivered by the Congressional Conference Committee, which made it clear that a financial plan needs to be in place for this project before it can move ahead. Moreover, the California Transportation Commission recently announced that it cannot meet current financial commitments and local projects will have to be scaled back and some will have to be abandoned.

Response. In response to direction from the U.S. House Appropriations Committee to reduce project costs, the BART and SamTrans boards directed staff to evaluate aerial design options to Alternative VI, as described in Section 1.2, Purpose of this Report, in the FRDEIR/S#2DEIS. The environmental impacts of the aerial design options were evaluated in the FRDEIR/S#2DEIS for the BART-San Francisco Airport Extension, released for public comment on October 6, 1995. Based on the environmental information in the FRDEIR/S#2DEIS and on a preliminary evaluation of comments on the document, on November 28 and 29, the BART and SamTrans boards modified the Alternative VI LPA, from south of Angus Avenue in San Bruno to the end of the tailtracks in Burlingame, to incorporate an aerial design option. The Alternative VI Aerial Design Option reduces costs anticipated for Alternative VI by approximately \$200 million, satisfying the direction from MTC and the Appropriations Committee. A financial plan is being developed and reviewed by all affected parties in a process parallel to that of the environmental documents. It will be presented upon its completion.

Please also refer to Response 16.27 for a discussion of the CTC commitment to the project.

- 32.22. The public needs a full picture and needs to know how this project impacts CalTrain, and how CalTrain impacts this project. The environmental document only lists the CalTrain-ALRS issue as an "area of controversy." This may well be accurate, but it only means that this item needs to be

analyzed; if it is an area of controversy, BART must provide sufficient information so the public will know the implications of the decision they are about to make.

Response. The FRDEIR/S#2DEIS was prepared to evaluate two design options to Alternative VI and is focused only on the segment of Alternative VI south of Angus Avenue in San Bruno to the end of the tailtracks in Burlingame. All significant impacts associated with these two design options are identified and mitigation proposed. The information and analysis in this document satisfies the standards and requirements of both CEQA and NEPA. Please refer to Responses 32.14 and 32.72 for a discussion of the grand jury report and Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- 32.23. Suppose the predictions on CalTrain transfers prove to be incorrect. What is the implication to this project? Can it sustain itself economically without those riders? The Supplemental DEIR does not say. If the project will be imperiled by a lack of transfers from CalTrain, the public should know that, as it may well be a critical factor in deciding whether to take the risk of approving this project. At a minimum, the final EIR should discuss the implications to this project if the predicted number of CalTrain riders do not transfer to BART.

Response. As noted in Responses 6.71 and 9.19, operations costs of the BART extension are to be covered with fare revenues, supplemented by a surcharge if imposed by mutual agreement between SamTrans and BART. The farebox total recovery rate is expected to be approximately 85 percent. If a surcharge is put in place, total recovery is expected to be more than the cost of operating the extension.

Please refer to Response 22.6 for a discussion of transfers between CalTrain and BART. Please also refer to Response 9.19 for a discussion of BART/SamTrans decisions regarding fares and surcharges.

- 32.24. With respect to the analysis of transit ridership in the Supplemental DEIR, our transit consultant, Jon Twichell Associates, has prepared a [transit] report which is attached as Exhibit 6. The points and questions raised in that report must be answered in the final EIR.

Response. The transit report referenced by the commentor is included as part of Comment Letter 32 in the FEIR/FEIS. All comments contained in that document are addressed thoroughly in this FEIR/FEIS.

- 32.25. We agree with the [...comments of the Peninsula Corridor Joint Powers Board regarding the Supplemental DEIR (Comment Letter 6)] that these are vital issues and that need to be addressed. They must be discussed fully in the final EIR, and properly mitigated.

Response. The comments of the Peninsula Corridor Joint Powers Board regarding the FRDEIR/S#2DEIS referenced by the commentor have been indexed and appear in the FEIR/FEIS in Chapter 3, Comment Letter 9.

- 32.26. The Supplemental DEIR, at page 2-17, mentions that “[a] traction power substation, train control bungalow and a 25-foot radio antenna would be located at the site of the existing San Bruno CalTrain Station.” Yet the Supplemental DEIR fails to discuss the impacts of the above structures on the operation of the existing station, including access to the station and the loss of parking.

Response. Please refer to Response 8.1 for a discussion of the impacts of the traction power substation, train control bungalow, and radio antenna.

- 32.27. The Supplemental DEIR...fails to address the visual impacts and community cohesion impacts of [the traction power and train control substation]. These impacts must be fully discussed in the final EIR, and like the JPB’s concerns expressed above, they must be properly mitigated.

Response. The above ground ancillary facilities located at the site of the San Bruno CalTrain Station are addressed on page 3.3-2, Impact 4, of the FRDEIR/S#2DEIS. The visual effect of these structures on community cohesion would not be any different than that the existing CalTrain station. In addition, landscape screening would be provided around the fence line of the ancillary facilities, wherever possible, to reduce the visual effect.

- 32.28. While BART has cut funds from this project, there is still considerably more money that can be trimmed. As noted above, it may be possible to cut an additional \$250 million from the project by building a single station west of Highway 101 (i.e., by pursuing Alternative V-B as opposed to the Alternative VI-Aerial). If this is done, will there be enough of a saving to provide for a bored tunnel through San Bruno?

Response. The cost of the project could be reduced in a number of ways, all of which would result in reduced service capability or increased impacts such as noise, vibration, traffic congestion, etc. Although a single-station alignment can certainly be designed, the impacts on the surrounding community would be greater than under any option studied thus far, and the reduced number of access points to the system would decrease convenience for San Mateo County residents and employees. An alignment that is at grade from Colma to Millbrae would also reduce costs, but would be less desirable for the cities than an option that offers substantial subway construction. Please refer also to Response 24.1 for a further discussion of a bored tunnel profile through San Bruno.

- 32.29. The bored tunnel is vital to San Bruno, as many of the businesses (including our client's) stand to be severely impacted by this project.

Response. BART would construct the cut-and-cover section in a phased manner designed to minimize the construction impacts that would limit access to businesses in downtown San Bruno, including the business represented by the commenter. It is not financially feasible to bore a tunnel in the subject area. Please refer to Response 24.1 for a discussion of why the bored tunnel construction method through San Bruno, under Alternative VI, was found to be infeasible due to a number of unmitigable impacts.

- 32.30. Artichoke Joes, for example, faces the loss of its leased parking lot when this project is constructed. How is that impact going to be mitigated without a bored tunnel? At a minimum, our client must have a suitable parking facility in place during construction. Our client has learned from experience that customers must see the front door from their cars; providing parking two or three blocks away will not work; neither will a shuttle-bus system or valet parking. We have tried free valet parking in the past and customers did not take advantage of it. They want to walk directly to their cars immediately across from the card room, and they want to see the front door of the card room from their cars.

Response. Access to local businesses would be maintained at all times, where practicable, during project construction. Where the cut-and-cover method of construction is utilized, parking would be temporarily displaced. However, adequate replacement parking would be provided through expanded use of downtown parking space. Please refer to Response 32.31 for further discussion of parking.

- 32.31. The adjacent parking lot must be maintained. If there is a mitigation measure that can do that, we must see it in writing and our technical consultants must be satisfied that our client's operation can be maintained at the present level (which is continuously, 24 hours a day).

Response. The City and County of San Francisco owns the property that has been used as a parking area between Huntington Avenue and CalTrain. In 1990, the City and County of San Francisco, through the San Francisco Water Department, entered into a revocable "land use permit" granting use of the property to the City of San Bruno. Under the express terms of this agreement, use of this property may be revoked at any time at the option of the City and County of San Francisco. The City

of San Bruno in turn entered into a revocable permit granting limited use of the property as a vehicle parking area.

On April 9, 1996, the City and County of San Francisco issued a 120 day notice to revoke use of this property. Therefore, parking may no longer be permissible in this area. The revoked permits contain no expectation or requirement for replacement parking to be provided. However, a replacement parking plan would be coordinated with the City of San Bruno to address local concerns regarding other loss, if any would occur due to the construction of the project, of vehicular access and employee or customer parking in Huntington Avenue-downtown area. Additional parking spaces to accommodate displaced parking, if any, would be provided through the following or equivalent measures, to be approved and implemented in coordination with the City of San Bruno:

Expanded use of downtown parking spaces. A combination of the following or equivalent measures would accommodate displaced parking, if any, along Huntington Avenue: (i) existing downtown public lots would be restriped and reconfigured to create additional spaces; (ii) additional parking spaces would be created on vacant city property on Huntington Avenue; (iii) existing spaces in private lots along Huntington Avenue, south of San Bruno, and along San Bruno Avenue and First Street would be subleased; and (iv) parking restrictions in existing downtown lots would be revised to allow greater use. BART would pay only for the actual costs incurred in implementing any replacement parking plan.

All project mitigation measures, including those related to temporary parking needs, will be included in the Mitigation Monitoring Program. Please refer to Response 6.77 for a discussion of this program.

- 32.32. One possible mitigation measure may be to utilize the surface street of Huntington Avenue temporarily for parking during construction. Quite frankly, we have not yet studied this option, and we do not know if it is feasible. If the period of traffic disruption is short, the City of San Bruno might find this acceptable.

Response. Thank you for this suggestion on mitigating a construction impact. Adequate replacement parking would be provided through expanded use of downtown parking spaces. Please refer to Response 32.31 for further discussion of parking.

- 32.33. Our client is willing to discuss appropriate mitigation measures, but approval from the City of San Bruno and all other pertinent regulatory authorities must be obtained so there is absolute assurance that any measure that might be agreed to will actually be implemented.

Response. All mitigation measures adopted by BART will be presented in the Mitigation Monitoring Program. For details on the content of the Mitigation Monitoring Program, please refer to Response 6.77.

- 32.34. It should be kept in mind that San Bruno's approval of the initial locally preferred alternative was premised upon there being a method of construction that does not disturb the city streets. To date BART has not made public its plan to mitigate construction impacts in San Bruno. When will we see such a plan in writing? Will this issue be addressed in the final EIR? If it is not dealt with properly, the support of the City of San Bruno for this project may well evaporate.

Response. Please refer to Responses 6.60, 6.64, and 8.32 regarding mitigation of construction impacts.

- 32.35. The BART Airport Extension may well take fare box money out of SamTrans and place it within the BART system. What happens if the current ridership of SamTrans lines 7B, 7F and 5M shift over to BART? These are SamTrans lines that serve downtown San Francisco; they carry 19,600 passengers

each day and generate substantial revenue for SamTrans. What is the impact on SamTrans if this revenue is lost to BART? What is the cumulative impact of (a) losing these riders, plus (b) losing CalTrain riders, while at the same time (c) being responsible for operating and maintaining the BART line through San Mateo County at a time when (d) federal operating subsidies are drying up?

Response. The MTC travel demand model predicts that some transit riders would leave SamTrans mainline bus routes, such as Routes 5L, 5M, 7B, and 7F, and instead ride BART. As a result, these routes would have longer headways between buses, when balancing the supply of buses to the demand by patrons. MTC's model predicts that these routes would require the following peak headways in the year 2010, without one of the BART build alternatives: Route 5L - 15 minutes, Route 5M - 5 minutes, Route 7B - 5 minutes, and Route 7F - 5 minutes. Under the BART build alternatives, the model predicted these routes would need to operate at the following peak headways to meet demand: Route 5L - 20 minutes, Route 5M - 12 minutes, Route 7B - 20 minutes, and Route 7F - 30 minutes. Some of the SamTrans patrons who would no longer ride these mainline routes would switch to local bus routes serving BART stations. These headways are model predictions and are used in the analysis, but the actual headways on each route would be determined by SamTrans after the BART-San Francisco Airport Extension is operating and the number of riders who actually continue to ride on each specific route has been determined.

Please also refer to Responses 6.71 for a discussion of operating costs of the BART extension, 6.14 for a discussion of SamTrans modeling of its bus lines, and 9.19 for a discussion of the inclusion of surcharges in modeled fares. Please refer also to Response 17.20 for a discussion of fare returns.

- 32.36. These questions raise again the issue of the need for BART's Airport Extension. If its main function is to take riders from other transit systems, it is really worth the money? Isn't the point to generate new riders and take cars off the freeway? There needs to be a clearer analysis and justification for the project in the final EIR; if the project cannot be justified, the public may well decide not to build it.

Response. Many different objectives were examined in the comparison of alternatives, although simply shifting riders from one transit system to another is not an objective. Examination of the change in transit person trips was one method used to study the increase in new transit riders. Daily regional transit person trips, or linked trips, would increase by 23,200 trips under the Aerial Design Option LPA compared to the No Build Alternative in 2010, while these linked trips would increase by 22,200 trips under the 1992 LPA and by 23,400 trips under the Alternative VI LPA, when compared to the No Build Alternative in 2010. These numbers are not projections for BART riders but for transit person trips that discount transfers between different transit systems by counting any one trip from origin to destination that uses transit, no matter how many different transit systems, as one transit person trip.

- 32.37. According to BART's latest figures, the cost of the airport extension is well over \$1 billion. In Table 6-1 of BART's September 1995 Focused EIR, the cost is stated as \$1,056,200,000, assuming 1996 is the midpoint of construction. But 1996 can never be the midpoint of construction; in fact, it is doubtful a shovel will even be in the ground before the end of 1996, at best. BART itself forecasts that environmental review will take until the middle of 1996. Construction cannot begin until that step is completed, a record of decision is entered, and a full funding grant agreement is in place. At best -- and this is the rosiest of scenarios -- construction cannot possibly begin until the very end of 1996 (a construction date in 1997 or later is much more realistic). If 1996 is not the midpoint of construction, it means the cost of building this project will inevitably escalate over the presently forecasted numbers.

Response. When conceptual cost estimates were prepared in 1994, 1996 was believed to be the midpoint of construction. Cost estimates will be refined through further engineering, and adjustments will be made to the schedule as required. Moreover, the current project schedule calls for the major construction contracts to be awarded in 1997. Since the construction contracts do not include an

annual inflation factor, the final nominal project costs are estimated in approximately 1997 dollar costs.

- 32.38. What will the final total be? And what about toxic remediation? How can BART accurately predict what the project will cost? The public is entitled to see a realistic figure, rather than a number that is, by now, an antique and a fraction of the real cost.

Response. Please refer to Response 16.3 for a discussion of capital cost estimates. Should hazardous materials be discovered during construction, those parties responsible for the contamination will be identified and all applicable laws complied with.

- 32.39. Even if we accept BART's cost estimate, the project still requires a massive increase in the Federal ISTEA earmark. At least \$370 million more in Federal funding is required. See Table 6.4 in BART's September 1995 Focused EIR. How can we depend upon that money from a penurious Congress?

Response. Please refer to Response 16.16 for a discussion of federal commitment to the project.

- 32.40. BART's financial plan also calls for the Airport to contribute \$167 million. Ibid. This comes after the Congress in June of 1995 clearly instructed BART not to count on Airport money in connection with this project because the Airport is already committed to spending \$2.5 billion on its own expansion project. The message is clear: if more money is required, it will have to come from state and local sources, and not from the Federal government or the Airport. Under any funding forecast, there will be a substantial local share that is presently unfunded.

Response. Please refer to Responses 6.67 for a discussion of the unfunded share of the extension.

- 32.41. The SamTrans portion of the project amounts to \$99 million, plus a BART "buy in" fee of an additional \$133 million, plus an additional \$98 million to be contributed to BART's East Bay extension program. How can SamTrans possibly fund these commitments, particularly at a time when federal transit subsidies are being cut back; when there are SamTrans service cutbacks in the pipeline; when this very project stands to convert SamTrans riders into BART riders and thus take farebox revenue out of SamTrans' hands; when there is a severe limitation on increasing local taxes as a result of the Guardino decision (*Guardino v. County of Santa Clara*, Cal. 4th ____ (1995), 95 DAR 7622; when the California Transportation Commission has announced it cannot meet existing financial commitments and may not be able to fully contribute to local projects (CTC money is factored into BART's financing scheme); and when SamTrans' bonding capacity may be imperiled?

Response. Please refer to Response 6.71 for a discussion of SamTrans' capacity to support the project; Response 18.15 for a discussion of SamTrans subsidy of bus routes; and Response 16.27 for a discussion of the California Transportation Commission (CTC) commitment to the project.

- 32.42. These concerns [listed in comment 70.41] caused SamTrans to require a "cap" on its contribution to the project, and required that a substantial portion of its payments be deferred and paid out of a hoped-for operational surplus. These requirements are stated formally as conditions to SamTrans approval of Alternative VI. These conditions were inserted for a good reason. SamTrans knows that if its contribution exceeds \$99 million due to the unavailability of Federal funds, it cannot raise the money.

Response. Please refer to Response 6.67 for a discussion of SamTrans' ability to support its portion of the project.

- 32.43. That is why [the Public Financial Management, Inc. Report on SamTrans Financial Capacity (PFM)] concluded...that "SamTrans should have the capacity to issue bonds to finance the \$99.0 million base case level or the \$102.8 million least cost alternative level. The higher cost alternative and LPA

scenarios [such as Alternative VI or the Aerial Option presently under consideration] indicate difficulty in issuing the level of debt required to cover the \$99.0 million commitment plus the unfunded local share. Additional revenue sources may have to be utilized in these scenarios to provide sufficient coverage.” Where will these revenues come from? Higher fares in the form of station surcharges? Will the project then fail because riders will not pay the higher fares, or ride in lower numbers?

Response. Please refer to Response 6.67 regarding the project financial plan, Response 6.71 regarding fare recovery rates, and Response 9.19 regarding surcharges.

- 32.44. More to the point: If the project is designed to serve only 5% of airport traffic, and if the hidden purpose is to create a new commuter line into San Francisco, why not follow the San Mateo County Grand Jury’s recommendation...and abandon this project and simply utilize the existing CalTrain system (or upgrade it for approximately half the cost)?

Response. The commentor’s opposition to the BART–San Francisco Airport Extension is noted. Please refer to Response 32.1 for a discussion of the number of trips by mode to the airport. Please refer to Response 32.72 for a discussion of the grand jury’s conclusion.

- 32.45. CalTrain is in place and can serve commuters right now; it will be even more effective once the relocation of the San Francisco terminal is completed.

Response. Increased service on CalTrain was one element included in the BART build alternatives, as well as in the TSM Alternative. The patronage impacts of the CalTrain downtown extension were included in the FRDEIR/S#2DEIS and the AA/DEIS/DEIR, both of which examined the impacts of the BART–San Francisco Airport Extension. Table 3.1-2, Alternative VI Aerial Design Option Daily Transit Operator Boardings, and Table 3.1-7, Alternative VI Aerial Design Option Daily Intermodal Transfers Between Rail Services, both in the FRDEIR/S#2DEIS, include the impacts of the CalTrain downtown extension on transit patronage and transfers between transit systems.

- 32.46. It should be noted that the “revenue sources,” identified on page 13 of [the Public Financial Management Inc. Report on SamTrans Financial Capacity (PFM)]...range from unlikely tax increases, the equally unlikely increases in Federal funding, to using airport money despite the express rejection of that concept by the House Appropriations Committee. In short, the revenue sources identified in the PFM report are unlikely to materialize, and therefore, it is almost impossible for SamTrans to afford this project without risking financial ruin.

Response. Please refer to Response 6.67 for a discussion of SamTrans’ ability to support its portion of the project.

- 32.47. The implicit message in [the Public Financial Management, Inc. Report on SamTrans Financial Capacity (PFM)] is that SamTrans must identify sure sources of additional revenue before it commits itself to this project; SamTrans knows this, and that is why SamTrans’ approval of Alternative VI is so heavily laden with conditions. The fact that the new revenue sources are unlikely to materialize means that there is a simple truth to this project: SamTrans can’t afford it.

Response. Please refer to Response 6.67 for a discussion of SamTrans’ ability to support its portion of the project.

- 32.48. This analysis...assumes the local SamTrans share is capped at \$99 million. What if the Federal money does not materialize? What if the state TCI funding does not come through? What if the airport money cannot be used to the extent forecasted? And what if the costs escalate over the 1996 “midpoint” numbers?

Response. The SamTrans Financial Plan has drawn conclusions from reasonable and achievable assumptions that are based on current, valid information.

Please refer to Response 6.67 for a discussion of SamTrans' ability to support its portion of the project. Also, please refer to Response 16.27 for a discussion of the CTC commitment to the project, and to Response 12.27 for a discussion of the SFIA commitment to implementation of the project. Please also refer to Response 6.75 for a discussion of the financial plan.

- 32.49. The unfunded local share for this project may well be as high as \$700 million (\$370 Federal shortfall; \$99 million in TCI funding unavailable; and a \$50 million cost escalation). Such massive unfunded portion means that the money isn't there to pay for BART's bloated airport expansion project.

Response. Please refer to Responses 6.71, 6.75, 12.27 and 16.27 for further discussion of project financing.

- 32.50. It must be kept in mind that the California Transportation Commission, for the first time in history, has acknowledged that it cannot meet all of its present financial commitments. If this is so, how will the state money (\$99 million) be there when it is needed for this project? And if it isn't there when it is needed for this project? And if it isn't there, it is clear that San Mateo County cannot afford to pick up the tab. The inescapable fact is that this project is too expensive, and involves too much risk for our local transportation agencies.

Response. Please refer to Responses 16.27 and 16.28 for a discussion of the CTC commitment to the project, and to Response 6.67 for a discussion of SamTrans' ability to support its portion of the project.

- 32.51. The Congressional Conference Committee...recently spoke out on this project. The Committee confirmed the House's action in June of 1995 to limit BART to approximately 40 percent of the funding it sought (\$10 million appropriated instead of the \$22 million requested) and noted several key concerns associated with the airport extension project that must be fully addressed prior to BART obtaining a full funding grant agreement. Among those concerns was the completion of environmental review; the criterion of a viable financing plan for the project; and the resolution of how CalTrain will be connected to the airport.

Response. Work on the financial plan for the extension is proceeding in a process parallel to the environmental process. The language of the House-Senate Conference Committee is guiding the development of the financial plan for the project. Please also refer to Response 16.16 for a discussion of federal participation in the project, and Responses 4.9 and 13.4 for a discussion of CalTrain connections to the airport.

- 32.52. The public is entitled under CEQA to an honest, realistic financial picture that can be understood by the Average citizen. The public has a right to know the risk it is being asked to underwrite - especially at the local level - and the Supplemental DEIR is woefully deficient. It does not begin to reveal the financial difficulties with this project in any realistic manner.

Response. Please refer to Response 6.75 for a discussion of the financial plan for the project.

- 32.53. One obvious change between former Alternative VI and the new aerial configuration is the potential visual impact on nearby residential neighborhoods in San Bruno. This issue (also noted by the City of San Bruno in its formal comments) is not analyzed in the Supplemental DEIR and needs to be covered in detail, as the residents most affected by this project have the right to know what is in store for them. They are also entitled to adequate mitigation on these impacts.

Response. The aerial portion of the alignment does not begin until San Felipe Avenue, and thus would not be visible from most San Bruno neighborhoods. Only the residences on the west side of San

Antonio Avenue at San Felipe Avenue and south would be able to view the aerial structure, and the trees that line the existing CalTrain tracks would obstruct views from many of these San Bruno homes. Impact 6 on page 3.3-3 of the FRDEIR/S#2DEIS describes the visual impact of the aerial structures as significant and unavoidable.

- 32.54. One impact that should be emphasized is the potential use of the proposed Tanforan Station as an "end-of-line" station during weekends. This may occur because of BART's plan to have all late night and weekend trains go in and out of the airport, without any "direct" service to Millbrae (see page 2-18 of the Supplemental DEIR). When this occurs, weekend riders bound for Northern San Mateo County or San Francisco may well skip the Millbrae station - thus avoiding the delay attendant to going in and out of the airport - and drive to Tanforan and board there. If this occurs, what is the impact of increased weekend traffic on San Bruno? On the Tanforan and Towne Center shopping malls? Will this also be a problem during the holiday shopping season? This potential impact is serious and needs to be addressed in the final EIR.

Response. Please refer to Response 8.39 for a discussion of parking and traffic at the Tanforan Station instead of the Millbrae Station on Sundays or late night Saturdays.

- 32.55. As we explained in our comments to the initial EIR, there are endangered species (the San Francisco garter snake) located in the wetlands area that must be traversed by the proposed aerial alignment. There also are other species that deserve protection (namely, the Red-Legged Frog and the San Francisco Forktail Damselfly); moreover, there may well be ancient Indian burial grounds in the vicinity and, as we have noted previously (see our comments to the January 1995 DEIR) historical buildings.

Response. Please refer to Response 51.1 for a discussion of current population figures of the San Francisco garter snake (SFGS) and possible impacts to their populations. Mitigation measures discussed in Response 12.15 will be implemented to minimize the impacts to resident snake habitats and populations. Impacts to the California red-legged frog and the San Francisco forktail damselfly will be mitigated through measures identified for the SFGS. These measures are expected to directly affect the red-legged frog forktail damselfly populations. Please refer to Response 16.34 for discussion of mitigation requirements for wetland and upland habitats. Please refer to Response 7.12 for a discussion of the process that was initiated to ensure the protection of sensitive wildlife species and habitats.

Archaeological reconnaissance and historic and archaeological survey reports for historical buildings have been completed. Please refer to Section 3.4 of the DEIR/Technical Appendix. Studies indicate that the only new historical property within the area to be affected by the project alignment discussed in the FRDEIR/S#2DEIS is located at 540 San Antonio Drive in San Bruno (see Section 3.4, Cultural Resources, of the FRDEIR/S#2DEIS). The west of Bayshore property identified in this comment was reviewed for potential prehistoric and archaeological resources, and no previously identified resources were found. The review of this property was included in the Archaeological Resources Technical Report and submitted to the State Historic Preservation Officer (SHPO) for concurrence. Several Native American tribes were consulted regarding potential burial grounds or significant resource areas throughout the project route. As the west of Bayshore property has been graded, covered with fill from other locations, and developed with several utility lines, it is considered degraded, and no archaeological resources are anticipated at this location. Investigation and sampling performed for the DEIR/SDEIS confirmed the absence of a large shell midden (CA-SMA-299) in shallow areas where it was previously identified along the banks of Colma Creek. Moreover, past disturbances in this vicinity suggest the site would not yield important information on prehistory or history and therefore would not satisfy Criterion D for National Register of Historic Places (NRHP) eligibility or Appendix K criteria for CEQA importance. The SHPO concurred, via a letter dated December 27, 1995, that the site is destroyed and is not eligible for the NRHP (see Volume V for further discussion).

- 32.56. Does BART have clearance from the California Department of Fish and Game and other responsible agencies (such as the U.S. Fish and Wildlife Service and the Army Corps of Engineers) with respect to the construction that is planned for the wetlands areas? Have the responsible authorities approved a mitigation plan for the environmentally sensitive areas and the endangered species and historic resources that exist within them?

Response. Please refer to Response 7.12 for a discussion of the regulatory agency consultation process intended to ensure the protection of sensitive wildlife and habitat. Impacts and proposed mitigation for unavoidable impacts to biological and historic resources have been reviewed by the appropriate resource agencies in order for BART to secure the required permits issued for construction of the aerial alignment over the west of Bayshore property under the Aerial Design Option LPA.

Please also refer to Response 32.55 for a discussion of the potential for impacts to cultural resources in the wetlands below the proposed aerial alignment.

- 32.57. A comprehensive thesis on the San Francisco garter snake is attached to these comments as Exhibit 10 and a discussion of issues pertaining to the Endangered Species Aspects of the BART-SFIA Option B alignment is attached as Exhibit 11. These exhibits caution about disturbance to the wetlands habitat located between San Bruno and the Airport. Does BART have an acceptable plan to mitigate and (if possible) avoid the concerns set forth in Exhibits 10 and 11?

Response. Comments 32.77, 32.78, 32.79 and 32.80 are taken directly from Exhibit 11 and are addressed in Responses to those comments. Exhibit 10 identifies loss of prey items, high mortality in young-of-the-year, competition with bullfrogs, and recreational activities (i.e., motorcycle riding) as factors contributing to the decline of the SFGS population on the west of Bayshore parcel. BART has developed with the U.S. Fish and Wildlife Service an acceptable mitigation program to enhance the wetland habitats on the west of Bayshore parcel and thus mitigate for these existing problems. These enhancement measures would include:

- Enhancement of seasonal wetlands in the southern end of the west of Bayshore parcel to retain water long enough to allow maximum metamorphosis of Pacific treefrog and California red-legged frog tadpoles;
- Bullfrog abatement pilot program;
- Hydrology study of the west of Bayshore parcel;
- Repair and proper operation of Cupid Row Canal tidal gates; and
- Captive feeding program to reduce mortality of young.

Please refer to Volume I and the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS for further discussion of SFGS and California red-legged frog habitat mitigation and management.

- 32.58. It should be noted that Alternative VI took approximately 1.5 acres of wetlands and grasslands during construction. Once the extension was completed, these areas were to be restored to their natural state. A temporary "laydown" area would have taken another 1.2 to 1.3 acres, which would be restored to its natural state following construction. In the aerial configuration, 7.2 acres, from San Luis to Santa Helena Streets will be permanently removed from the natural wetlands/grasslands area and covered by BART tracks. This is four times the previous area covered, and it will not be restored following construction.

Response. The proposed Aerial Design Option would result in the direct and permanent removal of more upland and wetland habitats on the west of Bayshore parcel than Alternative VI. These impacts are identified and defined in the environmental documents. Suitable mitigation measures for these

impacts are defined in the Biological Assessment, Biological Opinion, and Section 404 Mitigation Plan in Volume V of this FEIR/FEIS. Please refer also to Responses 12.15, 21.5 and 21.7 for a discussion of BART's mitigation program as presented in the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS.

- 32.59. The final EIR needs to analyze the wetlands issues in greater detail than the Supplemental DEIR, and must specifically discuss the impact of column construction, and the attendant vibration, dust, noise, etc. upon these sensitive environmental resources.

Response. The FRDEIR/S#2DEIS addresses construction impacts to wetlands in Chapter 3, Section 7, Biological Resources and Section 13, Construction. Mitigation measures have been discussed for sensitive species habitat loss, including management of existing habitat and habitat enhancement plans. Anticipated construction impacts on animal populations and proposed mitigation measures are also discussed.

Please refer to Response 12.15 for a discussion of mitigation and management measures.

- 32.60. Emergency egress from a train stranded on the aerial section will be from 68 feet above ground. Two years ago, when the issue first was raised, there were no emergency service agencies who would service the trains at this height. For that reason, BART found the 68 foot height to be unacceptable. Why is it acceptable now? The San Francisco Airport Fire Department must have the required equipment and resources to provide emergency services for both transportation systems. This is not a new requirement for the fire department, since the airport ALRS was proposed at 68 feet above ground two years ago prior to the BART aerial design.

Response. Under the Aerial Design Option LPA, the BART aerial structure within the airport area east of Highway 101 is about 44 feet above ground. The commentor is correct in noting that two years ago, when an aerial alignment over a Highway 101/I-380 flyover ramp was proposed by the City of San Bruno as an alternative route for the 1992 LPA alignment, one of the reasons for rejecting this proposal was that no ladders were available which could evacuate the train at a height of about 70 feet. The primary technical reason for staff rejecting the city's proposal, however, was seismic safety.

For the FRDEIR/S#2DEIS, BART Planning staff researched the issue of evacuation of trains from an aerial structure during an emergency and found that the BART Emergency Plan (1994) and Train Operators Manual (1983) cover this potential situation by defining appropriate procedures. These procedures include turning off the third-rail power and evacuating passengers via the walkway on the aerial structure. This impact is discussed further in Section 5, Community Services and Facilities, in the FRDEIR/S#2DEIS.

- 32.61. Doesn't it make more sense to let the Airport provide transit through the new alignment area via its planned ALRS? That would eliminate the cost, the emergency response issue, and given the statistics on the other alternatives, would provide as much service to the public.

Response. Please refer to Response 13.4 for a discussion of the ALRS connection to CalTrain. In addition, please refer to Response S45.1 for a discussion of the San Francisco City Attorney's legal opinion on the airport's commitments to making an ALRS connection to the west of Bayshore property for a CalTrain station.

- 32.62. There will be increased structural pile driving with the new aerial alignment. There appear to be about 30 aerial BART columns, requiring about 480 precast concrete piles (measuring 14" by 14" by 80') that have to be pre-drilled and driven at varying distances of between 200 and 900 feet from existing apartments and homes. Our construction consultant has advised us that there may be substantial cracking that could be generated in the area due to the surface and sub-surface shock waves from the pile driving.

Response. There are literally thousands of piles driven in open lots adjacent to buildings in every Bay Area city, including San Francisco, without damage to those buildings. In the unlikely event that damage to buildings would be expected to occur after further analysis, BART would design the piles to be cast-in-drilled-hole. Please refer to Response 32.63 for further discussion of pile driving.

- 32.63 The shock waves are likely to disrupt households and disturb both people and animals. They have the potential to ripple and crack pavement. The shock waves may have sufficient force to shake and crack buildings, depending upon the soil conditions, the distance from the source of the vibration, the building materials involved, and the ground elevation change above or below the vibration source's plane of incidence.

Response. The closest distance from pile driving (200 feet) indicated in this comment would normally be unlikely to cause damage to buildings, pavement or sidewalks. However, BART, in conjunction with its construction contractor, will evaluate the need for other than normal pile driving for the aerial structure column piles. An environmental compliance monitor will monitor vibration from pile driving during construction of the project, as indicated in the DEIR/Technical Appendix.

When BART built the original system, it used piles in many residentially and commercially developed locations, especially for aerial structure column support. For example, residential buildings in Albany are approximately 50 feet from columns supported on piles. There were no reported instances of damage to homes in this area. Residences in the Belle Air neighborhood would be much farther away. In addition, pile driving occurs on a regular basis in congested urban environments without damage to buildings and pavement.

Please refer to Section 3.9, Noise and Vibration, in the FEIR/FEIS for a discussion of noise and vibration impacts of pile drivers in San Bruno.

- 32.64. From this sort of pounding, an equivalent of between 1.5 to 3.0 seismic-type motion is generated. The shaking here is of greater concern because it will be regular and prolonged, rather than sudden and intermittent. The number of nearby pile driving blows could conceivably equal 200 years of cumulative minor seismic shaking, all condensed into a couple of months. Plaster and gypsum board cracking could be prevalent. Any building with concrete walls could experience very noticeable cracking. Buildings not bolted to their foundations could experience severe shaking and even some slippage.

Response. The focus of the FRDEIR/S#2DEIS is the Aerial Design Option to the planned Airport International Terminal.

Damages to structures from vibrations induced either from pile driving or earthquakes are normally assessed based on the levels of peak ground surface accelerations or peak ground surface velocities. Based on professional experience with pile-driving operations at similar sites, the levels of accelerations and velocities induced from pile-driving operations are significantly lower than the levels of accelerations and velocities from a 5.0 magnitude earthquake on a nearby fault.

Most of the attenuation relationships developed in various studies such as the data presented in the publication entitled "Ground Motions and Soil Liquefaction During Earthquakes," by Seed & Idriss, 1982, do not include earthquakes with magnitudes lower than 5.0. Earthquakes lower than this magnitude are not considered in engineering evaluations. The commentor suggests that construction vibrations would be equal to an earthquake ranging from 1.5 to 3.0, which is significantly smaller than a 5.0 magnitude earthquake. One cannot predict the number of cumulative years of minor seismic shaking equivalent to the vibrations induced by pile driving blows. However, it could be concluded that pile driving would not induce damages to engineered structures, when earthquakes smaller than 5.0 do not induce damages.

The nearest buildings to the proposed BART aerial structure within the SFIA property are an existing UAL cargo facility located approximately 150 to 250 feet away, and a proposed Rental Car Garage (RCG), which will be located approximately 50 feet away.

Both of these structures are also supported on pile foundations. Based on available information, the effects of vibrations from pile driving would not cause distress to the existing UAL cargo facility. The effects of pile driving vibrations on the proposed RCG would be minimal, since the structure would be supported on piles. Given its proximity, however, the effects of vibrations on this structure would be monitored during pile-driving operations.

- 32.65. These impacts [foundation cracking, shaking slippage] must be fully mitigated. Mitigation measures might include: a) Soil stabilizer cement and other chemical injection to solidify excavation trench sides and minimize or totally eliminate sheet pile driving. (We are informed that these measures worked well when the Colma extension was built.) b) Pre-drilling piles to a variable depth (the depth must be determined by pre-drilling tests). This technique both minimizes the number of driving blows needed to get the bottom end of the pile to bedrock, and it lowers the plane of impact incidence far below the elevation of residential foundation footings.

Response. The construction noise and vibration limits specified by the BART design criteria are set to avoid significant annoyance to occupants of nearby buildings. The vibration levels contained in this criteria are significantly lower than the levels which would result in structural damage to nearby buildings. Please refer to Response 19.12 and pages 3.13-160 to 3.13-163 in the DEIR/Technical Appendix for further discussion of these construction activity impact criteria.

The effects of sheet pile driving on adjacent structures were investigated in a study performed by Clough and Chameau (1979). In that study, vibration levels induced by sheet pile driving in two test areas in San Francisco were measured and correlated with the observed ground settlements. The results of that study are presented in a publication entitled "Response of the Soil to Vibrating Sheetpile Driving", on pages 57 to 75 of the report entitled "A Study of the Behavior of the San Francisco Waterfront Fills Under Seismic Loading", by G. Wayne Clough and Jean Lou Chameau, USGS Report No. 35, (February 1979). Accelerations and settlements of the ground were measured during the pile driving operations at both test areas, and peak values of measured accelerations and resulting settlements were plotted versus distance from the sheetpile. The results indicate that the acceleration levels decrease significantly in relation to the distance from the pile, and at a distance of 40 feet from the pile the accelerations are 0.02 g or less. Settlements measured after completion of the pile driving operations indicated that ground settlements became negligible at a distance of 40 feet from the sheetpile.

The Clough and Chameau (1979) study, and previous pile driving activity conducted by BART's geochemical contractor, offer additional evidence that vibrations induced by pile driving would not result in the impacts suggested by the commentor (i.e., foundation cracking, shaking slippage), since existing structures along the BART alignment are at least 50 feet away from locations where pile driving is anticipated. As noted on pages 3.13-161 to 3.13-163 of the DEIR/Technical Appendix, even though physical damage is not anticipated, BART will monitor vibrations induced by pile driving during construction, and mitigation measures will be implemented if the monitoring indicates vibrations are in excess of the established criteria.

There are specific mitigation measures which can be used under certain circumstances to reduce the number of pile driving blows and vibrations from pile-driving activity. The use of ultra-fine cement and other chemical injection methods to solidify the excavation sides can be a suitable alternative to sheet pile driving in some types of soils. However, this approach is generally not effective in bay mud which is known to exist at the southern end of the alignment in the vicinity of the San Francisco International Airport.

Pre-drilling can also be used to reduce the noise and vibration effects of pile-driving activity. The feasibility of pre-drilling and necessary pre-drilling depths are determined during the design phase of the project. This approach is recognized and already recommended as a potential mitigation measure in Section 3.13 Construction/ Noise and Vibration of the DEIR/ Technical Appendix.

- 32.66. The noise to be generated by construction and operation of the aerial alignment exceeds BART and local community limits. So far, BART has addressed this issue by suggesting an "aerial sound wall" and "other means." What are the specifics of these measures? How effective are they?

Response. Mitigation measures to control construction noise are indicated in the DEIR/Technical Appendix in Section 3.13 starting on page 3.13-161. The construction contractor would develop a noise mitigation plan, and during construction an environmental compliance monitor would monitor construction noise in the community. For operational impacts, noise mitigation measures have been identified as necessary for the aerial structure. These measures have proven to be effective in similar situations. For construction noise impacts, the noise limits indicated in Tables 3.13-11 through 3.13-13 in the DEIR/Technical Appendix will be imposed on the construction contractor. These noise limits are consistent with San Bruno's own construction noise limits (except, as noted in the DEIR/Technical Appendix on page 3.13-160, at night where residences are closer than 100 feet) and will be monitored by an environmental compliance monitor.

- 32.67. Floating roadbeds and track isolators were mentioned in the Alternative VI tunnel alignment for noise and vibration. In the aerial alignment, these mitigation techniques are only listed for vibration. Is there a study or other published information that causes this difference in mitigation measures?

Response. There were no significant vibration impacts from the aerial structure identified for BART operations (please refer to page 3.9-1). The only changes in noise impacts for the aerial wye-stub alignment to the airport are associated with groundborne noise, which arises from groundborne vibration from the subway. There are fewer groundborne noise impacts associated with the aerial wye-stub, compared with the Alternative VI tunnel alignment to the airport. The impacts associated with groundborne noise under Alternative VI are discussed in Chapter 3, Section 9, of the DEIR/Technical Appendix.

- 32.68. One noise issue that is not analyzed is the likelihood that BART trains running on the aerial in the rain will make loud squeaking noises as they make the turn into the airport. What mitigation measures are proposed to deal with this circumstance?

Response. There is no evidence that transit trains make significantly different noise when on wet tracks than on dry tracks. If anything, rainwater tends to lubricate the tracks, which should reduce noise. For example, water or other lubrication is sometimes used to reduce noise where there are tight-radius (100 feet) curves in streetcar tracks on city streets.

- 32.69. More information must be provided to ensure that the noise impacts are being properly mitigated as well as the vibration impacts discussed above.

Response. The FRDEIR/S#2DEIR has identified noise and vibration impacts where they are expected to occur, based on the proposed alignment alternatives and noise and vibration data available for the BART system. Where impacts have been identified, mitigation measures are presented. The expected level of impact following mitigation measures will be established based on a refined noise and vibration analysis of the selected alignment. Impact analysis will be based on additional field testing of soil characteristics along that alignment. Operational impacts will be mitigated to the criteria levels for noise and vibration contained in the BART design criteria (see Tables 3.9-3 through 3.9-6 in the DEIR/Technical Appendix). Feasible mitigation measures to achieve the criteria have been identified. Construction noise and vibration will be monitored by an environmental compliance monitor, using the criteria contained in Tables 3.13-11 through 3.13-14 in the DEIR/Technical Appendix.

- 32.70. Hydrology and flood run-off become important in the aerial configuration due to its proximity to the Southern Pacific right-of-way. Flash flood rain sheet run-off from Lomita Park and beyond sits between San Antonio Avenue and the right-of-way. The existing ballasted road bed is compacted, but it is large rock and is quite permeable. The new alignment will have compacted earth areas for maintenance buildings in many places. This new fill to the east of the right-of-way will not be permeable for flash flood waters. The flood water holding area is not being noticeably resized. However, the existing flood creeks and canals may need to be re-sized wider than the existing ones, as a safety factor replacement for the now eradicated permeable ballast roadbed safety factor.

Response. Please refer to Response 12.11 for a discussion of stormwater drainage mitigation.

- 32.71. The basis of rainfall per hour is set 2" per hour by the Army Corps of Engineers. Recent rains have indicated that 4" to 5" per hour is occurring twice yearly in the Coastal and Central Valley regions. This issue needs additional study and may need serious attention in the final EIR.

Response. The commentor's reference to precipitation rates of 4 and 5 inches per hour may occur for five to ten minutes in infrequent and isolated incidences, but the hourly average does not exceed 2 inches. The average annual precipitation at the SFIA (between 1948 and 1989) is on the order of 20 inches, according to the National Oceanic and Atmospheric Administration, with January being the wettest month (averaging less than 5 inches total). Based on this information, compliance with Section 404 requirements and the criteria set forth by ACOE will be appropriate for this area.

- 32.72. In summary, the 1995 Grand Jury supports...a regional rail transportation system [that] can be achieved at far less cost by upgrading the CalTrain System [rather] than...further BART extension into San Mateo County.

Response. An underlying assumption of the grand jury report is that CalTrain and BART provide competitive services in San Mateo County and that the BART extension to the San Francisco International Airport would undermine the CalTrain system. In fact, the two systems are complementary, both are needed to meet forecast future demand, and the best service to San Mateo residents would be available from a BART-San Francisco Airport Extension in conjunction with existing CalTrain service.

Since the BART extension would provide for an intermodal transfer station between BART and CalTrain, the BART project would yield a net *increase* in CalTrain ridership. This ridership would come from not only providing CalTrain riders with access to the SFIA for the first time, but also from improving their access to BART's San Francisco and East Bay service areas.

The complementary nature of BART and CalTrain is both geographic and service-based. CalTrain serves Santa Clara, San Mateo, and San Francisco counties, and the BART extension is not linked to any plan to curtail that service. BART can offer additional, and in some cases superior, service to northern San Mateo County residents and employees, including airport employees. San Mateo residents working in the Civic Center, retail areas near Union Square, or most parts of the San Francisco financial district would have more convenient access via BART than they have via CalTrain. This also holds true for San Mateo County residents employed in the East Bay, and East Bay residents who travel to San Mateo County to work.

CalTrain is designed to meet the needs of the long-distance commuter, while BART provides the most efficient service to patrons traveling shorter distances, which make up the larger group of travelers. The average CalTrain weekday trip is 22.8 miles, while the average weekday BART trip is 12.6 miles. In a ridership market characterized by a lengthy Peninsula with a great density of jobs at the northern end, the two services are mutually supportive.

Both CalTrain and BART–San Francisco Airport services are necessary to ease the congestion expected to result from the coming increase in passengers at the SFIA. By 2006, weekday vehicular trips are expected to increase over 62 percent from the 1990 total. The additional 70,000 weekday vehicular trips projected without a BART extension or Airport–CalTrain station can be partially reduced by constructing the BART extension, which would include the Millbrae Intermodal Station, designed to allow both BART and CalTrain riders to arrive at the new Airport International Terminal. The BART extension with the Millbrae Intermodal Station is the best solution yet designed to reduce future SFIA-related congestion in northern San Mateo County.

An underlying assumption of the grand jury report is that, with modifications, CalTrain can offer BART-type service in terms of frequency and travel time. However, providing service with BART headways (every 4.5 minutes in the peak period and every 7.5 minutes during the base period) would require the purchase of numerous additional CalTrain locomotives and cars. Increasing CalTrain service from its current weekday average of 3.2 trains per hour to BART's San Mateo County service of 9.1 trains per hour would require a huge expense in terms of vehicles alone.

Moreover, CalTrain could not be increased to BART frequency without causing either a significant investment in grade separations, costing hundreds of millions of dollars, or major traffic disruptions along the Peninsula during peak periods. Because CalTrain is not grade separated at most intersections with street traffic, signal arms would be descending every four to five minutes at intersections such as San Bruno/Huntington in San Bruno, Broadway/California in Burlingame, and Holly Street/Old County Road in San Carlos during the peak commute period. Such an increase in service to CalTrain patrons would result in an extraordinary decrease in level of service, as well as level of safety, to vehicular traffic along the route. The lack of a secured or grade-separated right-of-way also poses serious safety issues when frequencies of this sort are contemplated.

In contrast to the presentation made to the Board of Supervisors in the grand jury report, the BART–San Francisco Airport Extension is an excellent investment for San Mateo County as it pertains to costs borne by the county, and the long history of cooperation between BART and the county underscores this position. For an estimated capital investment of \$476 million, the Colma and SFIA extensions will carry nearly 85,000 additional daily trips, with little or no annual operating contribution required from the county. This investment in BART technology and the resulting service compares favorably with upgrading CalTrain and extending service to downtown San Francisco, which would cost San Mateo County \$657 million to carry approximately 20,000 to 23,000 additional riders.

In terms of operating costs, CalTrain is substantially more expensive to operate than BART in terms of San Mateo County riders carried per San Mateo County dollar expended. San Mateo County's 1995/1996 operating costs for CalTrain are approximately \$13.1 million, and an estimated 2.2 million trips begin or end in San Mateo County each year. On the other hand, San Mateo County does not subsidize the cost of the 5.8 million trips beginning or ending at the Daly City BART Station.

In the opening year of the BART extension, BART projects 26.2 million annual trips in San Mateo County. San Mateo County's operating costs for the extension are estimated at \$5.5 million that year, so a trip on BART would cost the county \$0.21. Imposition of a station surcharge, as permitted by the BART–SamTrans Agreement, could reduce the county's operating expense to zero. The facts do not support the allegation of the grand jury report that operating the BART–San Francisco Airport Extension will be very costly for the county.

- 32.73. Recommendation 1: That the San Mateo County Board of Supervisors, the San Mateo County Transit District (SamTrans), the San Mateo County Transportation Authority, and the San Mateo County members of the Peninsula Rail Transit District (JPB) cooperate and concentrate on achieving a regional rail system utilizing CalTrain as the Peninsula corridor leg of the system by upgrading its frequency to BART-like standards, electrifying it, connecting it with San Francisco International Airport's Light Rail System (ALRS), and extending it into downtown San Francisco.

Response. Please refer to Response 23.10 for a discussion of the two corridors. In addition, the commentor is referred to Response 32.72 for discussion of the grand jury report.

- 32.74. Recommendation 2: That the Peninsula Rail Transit District investigate the feasibility of activating CalTrain service on the Dumbarton Bridge Rail Spur right-of-way for an East Bay connection.

Response. Dumbarton Bridge Service, recommended in the grand jury report, was the subject of a 1991 Joint Powers Board study in 1990 and 1991. The Dumbarton Rail Technical Advisory Committee concluded that the proposed service did not justify implementation for a variety of reasons and that it was not economically feasible at that time. The one-hour peak-period headways and projected ridership of 870 persons per day undoubtedly contributed to these conclusions.

- 32.75. Recommendation 3: That the San Mateo County Board of supervisors and the San Mateo County Transit District (SamTrans) withdraw immediately from the BART/SamTrans agreement to extend BART to San Francisco International Airport or any further into San Mateo County.

Response. The commentor's recommendation that the San Mateo County Board of Supervisors withdraw from the BART-SamTrans Agreement is not possible, due to the fact the Board of Supervisors is not a party to the agreement. SamTrans is the lone San Mateo County authority responsible for the BART extension project.

SamTrans is a willing partner in the BART-SamTrans agreement to extend BART to the SFIA. In November 1985, San Mateo County voters passed Measure A, which authorized SamTrans to allocate funds for the BART Colma extension, by a 73 percent favorable vote. In November 1987, San Mateo County voters approved Measure K, which provides for the use of SamTrans funds for a BART extension beyond Colma to the vicinity of the SFIA, by 61 percent. The BART-SamTrans Comprehensive Agreement, signed in 1990, is currently being renegotiated at the request of SamTrans. The agreement requires recalculations and renegotiation of a number of points, including recalculating Colma operating costs at the end of five years from the date of commencement of Colma service and every five years thereafter until service has commenced at the southernmost station of the BART extension; revision of the amount of overhead to be allocated under the SFIA formula at the request of either party; and negotiation of an entirely new agreement between San Mateo County and the BART District in the event of annexation.

- 32.76. Recommendation 4: That the 1996 Grand Jury continue the analysis of the transportation agencies that affect San Mateo County transportation with the purpose of reducing cost and enhancing service.

Response. The commentor's preference that the grand jury continue to analyze transportation agencies affecting San Mateo County transportation is noted. The activities of the grand jury in San Mateo County are outside the scope of the BART extension FEIR/FEIS. Please refer to Response 32.72 for a discussion of this grand jury report.

- 32.77. The Supplemental DEIR does not describe adequately the effect of the anticipated permanent loss of over ten acres of wetland and upland habitats on the SFGS. Option X has the potential for significant disruption of wetland and upland habitats of SFGS, including loss of breeding, feeding, and cover habitats. Construction activities will lead to increased potential for mortality, disruption of travel corridors, and reductions in food sources, all of which could potentially threaten the viability of this species.

Response. Impacts to the San Francisco garter snake (SFGS) are addressed in Sections 3.7 and 3.13 of the FRDEIR/S#2DEIS. Appropriate and approved mitigation measures to reduce impacts and avoid jeopardizing the SFGS and red-legged frog populations on the site have been developed through the Section 7 consultation process with the U.S. Fish and Wildlife Service (USFWS) and are described in the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS.

- 32.78. [In the City of San Bruno's comment on the FRDEIR/S#2DEIS] it is concluded that upland areas, near feeding habitats such as canals and seasonal wetlands, are used by the SFGS as a nighttime retreat during early spring through late fall. The Supplemental DEIR, however, only considers the loss of wetlands habitats and does not include any mitigation measures for impacts to upland habitats of SFGS....the mitigation plan is deficient. The Supplemental DEIR does not establish that the planned mitigation will assure the continued existence of the SFGS or appreciably improve the likelihood of its survival.

Response. Appropriate mitigation measures have been developed through the Section 7 consultation with the USFWS and are described in the Biological Assessment and Biological Opinion in Volume V of this FEIR/FEIS. Please refer to Volume I, Sections 3.7 and 3.13 for discussion of mitigation measure requirements for restoration of impacted upland habitats.

- 32.79. The Supplemental DEIR focuses almost entirely on the potential impacts of the proposal on the SFGS, and does not adequately consider the potential effects on the other species of concern which inhabit the west of Bayshore parcel, namely the California red-legged frog and San Francisco forktail damselfly. The Supplemental DEIR neither provides current population figures for any of the species of concern on the west of Bayshore parcel, nor discusses the reductions in population that may occur as the result of this project or the effect such reductions may have on the viability of those species as a whole. Lastly, the Supplemental DEIR fails to describe any planned measures to mitigate impacts to the habitats of these species.

Response. Please refer to Response 51.1 for a discussion of current population figures and possible impacts to their populations. Please refer to pages 3.7-5 and 3.7-7 of the FRDEIR/S#2DEIS and Response 16.34 for discussion of mitigation requirements for wetland and upland habitats relative to the San Francisco garter snake (SFGS), the California red-legged frog and the San Francisco forktail damselfly.

- 32.80. As set forth in the Section 404(b)(1) guidelines, the relevant agencies must demonstrate in the Final EIS that the alternative selected is the least environmentally damaging practicable alternative in order to receive a Section 404 permit. It appears that Option X is not the least environmentally damaging practicable alternative, in terms of impacts to wetlands and special aquatic sites, which would violate the Section 404 guidelines.

Response. Please refer to Response 21.5 for a brief discussion of how the Aerial Design Option Alternative VI does meet the Section 404(b)(1) guidelines. Also refer to the Public Notice issued by the ACOE on the Section 404 permit application submitted by BART in Volume V.

- 32.81. It is not clear whether the agencies have adequately considered historic resources as required under the National Historic Preservation Act (the "NHPA")....As discussed in a cursory manner in the Supplemental DEIR, the proposed BART extension will adversely impact a number of historic properties, including some historic structures and cemeteries. Consequently, agencies involved must comply with the NHPA....It is clear at this point that the agencies involved have not undertaken any kind of process to identify potentially eligible properties, such as archaeological sites, that may only be discernible through a more in-depth survey, as required by the NHPA.

Response. Research to determine properties that are potentially eligible for the National Register of Historic Places has been performed along the project corridor. This research has been reviewed by the State Historic Preservation Officer, in compliance with the National Historic Preservation Act (NHPA), who has concurred with the eligibility determinations. Please refer to Volume V for the documentation submitted to state and federal agencies in compliance with Section 106 of the NHPA.

- 32.82. The impacts of this project on properties potentially eligible for listing on the National Register of Historic Places should be addressed by means of Programmatic Agreement among the relevant state

and federal agencies, with input from concerned citizens. The Advisory Council on Historic Preservation regulations provide that a Programmatic Agreement is appropriate when, among other things, the effects on historic properties cannot fully be determined prior to approval and when non-federal parties are delegated major decision-making responsibilities. Moreover, the NEPA/CEQA document should set forth a discussion of how the agencies are complying with their obligations under the NHPA.

Response. BART has coordinated with the State Historic Preservation Officer (SHPO) regarding the identification of potentially eligible structures in the project area and potential project effects on those properties. Furthermore, the Federal Transit Administration (FTA) and BART have submitted the required documentation under Section 106 of the National Historic Preservation Act, including a Finding of Effect (see Volume V of the FEIR/FEIS). The project has been found to have an adverse effect to one property, the cut-stone bridge. For this property, a Memorandum of Agreement (MOA) has been signed by BART, SamTrans, FTA, SHPO, and the Advisory Council on Historic Preservation. Due to these actions in compliance with Section 106, a programmatic agreement would be unnecessary.

- 32.83. In 20 years of reviewing EIR's and writing transportation sections for environmental documents, I have never seen a document which provides such a vast sea of generally useless information, which lacks so much essential data, and which deliberately obscures and obfuscates key issues and key analyses.

Response. The FRDEIR/S#2DEIS was prepared to evaluate two design options to Alternative VI and focuses only on the segment of Alternative VI south of Angus Avenue in San Bruno to the end of the tailtracks in Burlingame. All significant impacts associated with these two design options are identified and mitigation proposed. The information and analysis in this document satisfies the standards and requirements of both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

- 32.84. The Supplemental DEIR/DEIS continues to present contradictory/inconsistent information re: the transit modal share of trips to San Francisco International Airport.

Response. The percentages derived from the MTC model cannot be compared against the survey numbers in Table 3.1-2, SFIA Airline Passenger and Employee Access Modes Percent Distribution, in the DEIR/Technical Appendix as suggested by the commentator. The number of trips by mode to SFIA for every alternative examined have been presented in table format in the FRDEIR/S#2DEIS, see Table 3.1-5, Alternative VI Aerial Design Option Daily Trips by Mode to SFIA, in the DEIR/Technical Appendix, and the AA/DEIS/DEIR. In 1998, the percentage of transit trips to SFIA which includes BART, CalTrain and Bus, increases from 9.8 percent under the No Build Alternative to 14.1 percent under the Aerial Design Option LPA. The mode categories in the Table 3.1-2 and Table 3.1-8 in the DEIR/Technical Appendix cannot be neatly compared because on-call transit in Table 3.1-2 includes both taxis and shuttle buses while the auto category in Table 3.1-8 includes taxis and the bus category in Table 3.1-8 includes shuttle buses.

- 32.85. While BART predicts a specific number of trips for itself, 10,100 trips in 1998, Option "X," Table 3.1-5, BART does not compare those trips to total SFIA trips within the SEIR/DEIS. If you take BART's low estimated of total SFIA trips, 191,000 in 1998, this yields a BART modal split of 5.3 percent. If you utilize SFIA's own estimate of trips in 1996, 239,758 daily trips, as forecasted in the Airport's Master Plan Expansion EIR (Table 28, page 282), you will arrive at a BART mode split percentage of 4.2 percent. In other words, over one billion dollars buys you less than five percent of Average Daily Trips to SFIA. This is substantially less than the ADT for van shuttles, which exist with no public expenditure.

Response. Provision of transit service to the airport is one of many objectives used in evaluating the effectiveness of the Aerial Design Option LPA. Please refer to Response 32.1 for a discussion of trips to the SFIA. The proposed project would provide regularly scheduled transit service between northern San Mateo County, including the SFIA, and other areas served by BART which is a different type of service than on-call transit, such as van shuttles. In addition, the proposed project would connect BART service to CalTrain service thus linking rail services to all three major metropolitan areas in the region. The proposed project would also include direct rail transit service into the SFIA and as such would provide an option to van shuttle service that is currently unavailable. Please also refer to Responses 18.6 and 25.7 for a discussion of van shuttle service to the SFIA.

- 32.86. Table 3.1-6 of the January DEIR/DEIS clearly presents transit ridership figures which indicate little difference between the TSM Alternative II and BART's Alternative VI to SFIA. Tables 3.1-8 in the January document and 3.1-5 in the Supplemental document present differing transit ridership numbers to SFIA, although generally in the same proportions. Table ES-2 of the Supplemental presents transit ridership figures for the various alternatives which are widely at variance with both sets mentioned above.

Response. Please refer to Response 18.4 for a discussion of transit ridership estimates between the TSM Alternative and the BART build alternatives.

- 32.87. Table 3.1-6, page 3.1-17 of January, 1995, BART DEIR indicates that Alternative II, the TSM Alternative, would create transit use to SFIA of 18,700 trips (1998 figures). Alternative VI, the present Locally Preferred Alternative, would create transit usage to SFIA of 21,300 daily person trips; a difference of only an added 2,600 trips per day...1,300 additional patrons taking two-way trips.

Response. Please refer to Response 18.4 for a discussion of transit ridership estimates between the TSM Alternative and the BART build alternatives.

- 32.88. Table 3.1-5, page 3.1-8 of the September, 1995, Supplemental BART DEIR indicates that "Option X" would generate 700 fewer BART trips to SFIA, and 400 fewer overall transit trips.

Response. Please refer to Responses 18.4 and 18.22 for a discussion of transit ridership estimates between the TSM Alternative and the BART build alternatives.

- 32.89. Although Table 3.1-6, "Transit Utilization by Geographic Area" is explicit in its wording and the information presented, BART may wish to argue that Table 3.1-8 from the January DEIR, "Daily Trips by Mode to SFIA" is a more appropriate comparison to Table 3.1-5 of the September document, which bears the same title. For reasons known only to BART's EIR preparer the numbers in Table 3.1-5 for daily person trips to SFIA (1998, Alt. VI - 21,300) do not match the selfsame number within Table 3.1-8, or the updated 3.1-5 in the September document (1998, Alt. VI - 27,300, or Option "X" - 26,900). Of course, the Alternative II TSM transit patronage numbers also vary from Table to Table (Table 3.1-6 - 18,700 vs. Table 3.1-8 - 23,500).

Either way, Alternative II provides from over 87 to over 89 percent of the transit ridership of Option "X" for one-third the capital cost, and at a savings of over one billion dollars in operating costs over a 20-year period.

Response. Please refer to Responses 18.4 and 18.22 for a discussion of transit ridership estimates to the SFIA between the two different tables.

- 32.90. While BART does not present nor highlight the relatively tiny difference in transit ridership to SFIA between Alternative II and Option "X," it does present other transit ridership numbers designed to better make its case. Table ES-2 claims that daily regional transit ridership in 1998, compared to the No Build alternative, would increase only 2,100 trips for Alternative II, but 37,600 trips with the Aerial

Design Options. Further, Table 6-6 claims...in the year 2010...that Option "X" shows an increase in regional transit ridership of 23,200 trips, over the TSM alternative.

Response. Please refer to Response 69.2 for a discussion of transit ridership estimates among the tables indicated.

- 32.91. The Costs Per New Rider presented by BART, even as improved by Option "X" (\$26.12), remain "Well above the range which FTA typically considers representative of relatively cost-effective, fixed guideway systems, i.e. \$5 to \$15 per new rider."

Response. Please refer to Response 6.76 for a discussion of the cost-effectiveness index, and the fact that there is no Federal Transit Administration (FTA) standard to meet in order to be funded.

- 32.92. BART only compares the CEI (Cost Effectiveness Index) of its various BART alternatives, without providing the essential benchmark of FTA guidelines. The DEIR/DEIS should provide a context for the BART figures, and clearly state that BART substantially exceeds the FTA guidelines.

Response. Please refer to Response 6.76 for a discussion of the cost-effectiveness index.

- 32.93. Table 3.1-5 of the SDEIS/DEIS asserts daily trips by mode which fly in the face of common sense. Well over half of SFIA's employees live south of the Airport, along a relatively narrow travel corridor. Yet, BART predicts it will carry well over two and two-thirds as many work trips daily as CalTrain. Other projections within this table are similarly unrealistic.

Response. Please refer to Response 32.1 for a discussion of access to the SFIA via CalTrain and BART.

- 32.94. Table 3.1--1 in the January DEIR/DEIS clearly indicates that 56.4 percent of SFIA employees live south of the Airport, compared to 40.4 percent who live north of the Airport (3.2 percent live out of the Bay Area). Yet, BART predicts in Table 3.1-5 of the Supplemental (1998 Option "X") that only 24.6 percent of employees trips to SFIA will be via CalTrain, while 66.1 percent of employee trips will be on BART (the remaining 9.3 percent are forecast to be via bus.)

There is not logic whatsoever to this forecast. The 40 percent of employees north of the Airport are all over the Bay Area, not all located conveniently to BART. The 56 percent south of the Airport are mainly located in the compact Peninsula Corridor. It would make far more sense for the percentages of employees transit trips to be reversed.

The total trips to SFIA are similarly off. It is this type of logical inconsistency that calls into question all of the calculations in this environmental document. Are these calculations unbiased and inept, or simply constructed to justify BART's demands to build this project?

Response. The estimates of daily transit patronage for BART and CalTrain are based on the regionally approved MTC travel demand model, as required by the Federal Transportation Administration (FTA). Please refer to Response 6.10 for a discussion of the SFIA employees living south of the airport. Please refer to Response 4.9 for a discussion of connectivity for CalTrain riders accessing the SFIA. Please note that in Table 3.1-5, Alternative VI Aerial Design Option Daily Trips by Mode to the SFIA, in the FRDEIR/S#2DEIS, the CalTrain trips to the SFIA are listed separately from the BART trips, but these riders would also use BART to access SFIA and were not included in the BART ridership in the table. Of the 7,400 SFIA employees using BART to and from the airport, approximately 27 percent use CalTrain and travel to the airport from the south. Please refer to Response 32.1 for a discussion of SFIA employee location.

- 32.95. The capital costs of Alternative II, the TSM alternative, are deliberately omitted from Table 2.3-1 of the January document. Why? Because they indicate that Alternative II is one-third the cost of Option "X", while Table 3.1-6 of the January document combined with the lowered ridership estimates of the Supplemental, indicates you will generate 90 percent of the transit ridership to SFIA for that one-third price.

Response. Please refer to Response 18.7 for a discussion of the capital costs of Alternative II. Please also refer to Responses 18.13 and 18.22 for a discussion of transit ridership to SFIA.

- 32.96. What is the TSM Alternative, and what are its costs? Alternative II is described on pages 2-26 - 2-30 of the January, 1995, DEIR as consisting mainly of a CalTrain - ALRS connection, plus an increase in CalTrain service to 86 trains daily, and mirror SamTrans bus rerouting.

Response. Please refer to Response 18.7 for a discussion of the capital costs of Alternative II.

- 32.97. This...CalTrain - ALRS connection is strongly supported by Santa Clara and San Mateo Transportation Boards and Authorities, and is being independently studied over the next several months. Funding of the CalTrain - ALRS link is anticipated to come from \$120 million set aside from existing airport expansions funds, by SFIA, for traffic mitigation in San Mateo County. Therefore, it can be assumed that the TSM Alternative costs are substantially less than the Option X estimate of over \$1 billion.

Response. Please refer to Response 18.7 for a discussion of the capital costs of Alternative II, and Response 32.10 for a discussion of the Airport Light Rail System (ALRS).

- 32.98. What does the BART DEIR estimate for Alternative II costs? The Alternative II capital costs are deliberately omitted from the DEIR. Although annual operating costs are included for Alternative II (Table 2.3-2), since they are in the same range as the costs for BART alternatives, Table 2.3-1 omits Alternative II capital costs estimates.

Response. Please refer to Response 18.7 for a discussion of the capital costs of Alternative II.

- 32.99. The preliminary estimate for TSM Alternative II capital costs is:

a.	increased CalTrain service	\$283 million
b.	increased SamTrans service	\$10.7 million
c.	San Bruno grade separation	\$38.7 million
d.	ALRS connection (SFIA funded)*	\$17-32 million
	Total	\$349.4 - \$364.4 million

* Preliminary cost estimate from LEA & Elliott, SFIA ALRS consultant; \$16 million for ALRS, \$1-16 million for utilities relocation.

While these are 1991 dollars, their increase in the intervening four years has been minimal, and the fact remains these costs are about one-third those of Option "X." If you go by the first BART table comparing transit trips to SFIA, the TSM alternative generates over 89 percent of Option "X" trips; if you go by the second set of BART numbers, the TSM alternative generates over 87 percent of "X." In either case, Alternative II is far more cost effective and far less intrusive into the environment.

Response. Please refer to Response 18.7 for a discussion of the capital costs of Alternative II, and Response 18.22 for a discussion of the analysis of impacts associated with all proposed project alternatives.

- 32.100. BART has omitted any discussion of the cumulative freeway traffic impacts of the SFIA expansion combined with the BART extension. It is extremely ironic that a mass transit project is causing significant negative traffic impacts (to LOS F) on a key artery (Route 101.)

Response. Please refer to Responses 18.8 and 18.9 for a discussion of cumulative traffic impacts which would occur with implementation of BART and SFIA Master Plan expansion projects.

- 32.101. Cumulative impacts have been shown by successful litigation vs. the City and County of San Francisco to be an essential component of a complete EIR. Yet, the BART reports omit any discussion of cumulative traffic impacts of the SFIA expansion combined with BART's Option "X." BART's thoughtless deterioration of LOS on Route 101 needs to be fully explained under a cumulative examination of impacts, combined with a full mitigation program with a full funding commitment from BART.

Response. Please refer to Responses 18.8 and 18.9 for a discussion of cumulative traffic impacts which would occur with implementation of BART and SFIA Master Plan expansion projects.

- 32.102. Despite both verbal and written requests from elected officials and citizen groups, BART refuses to provide a cost breakout in the Supplemental document or for public information, of the Millbrae segments of the Wye. The cost of a "no-Millbrae" BART extension needs to be part of the public record.

Response. The Millbrae section of the wye alignment is between the point where the northbound aerial structure diverges from the southbound structure and the point where the southbound structure joins the southbound mainline. The estimated capital cost of this 1,350-foot section is \$24 million.

- 32.103. BART asserts it has a political mandate to go directly into the Airport. However, it has no mandate at all to provide three-way, convoluted service to Millbrae, with a 1500-foot tail track intruding into Burlingame. The purpose of this expensive effort is to force CalTrain riders off CalTrain and onto BART in order to access the Airport, and to allow BART to intrude further into San Mateo County.

Response. Please refer to Response S11.1 for a discussion of Measure K and the public mandate. Please refer to Response 23.10 for a discussion of the two travel corridors which CalTrain and a BART extension would serve. In addition, please refer to Response 32.72 for discussion of the complementary nature of BART and CalTrain.

- 32.104. It is a clear and obvious fact that a direct CalTrain-ALRS connection, or a downtown San Bruno station (some variation of Alternative 5B) would provide for a true intermodal station with direct service to SFIA, without the extreme negative traffic impacts on Route 101, and at a cost at least \$200-\$250 million cheaper than Option "X."

Response. The commentor's support for a true intermodal station with direct service to the SFIA (direct CalTrain-ALRS connection or some variation of Design Option V-B) is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. It should be noted that Table 3.1-93 of the DEIR/Technical Appendix presents a comparison of traffic congestion on Highway 101 with and without the BART extension. As seen in that table, traffic conditions north of Millbrae Avenue would improve, while traffic conditions south to Broadway would worsen. The commentor is also referred to Response 26.6 for an explanation why BART service is proposed to be extended south of the SFIA. Please also refer to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- 32.105. To merely mention the study of the direct connection of CalTrain to the Airport's ALRS under "Controversy" is insufficient. What is being withheld is the negative impact on BART ridership projections, as well as the positive impact on CalTrain ridership projects. Removal of the forced transfer onto BART in order to access SFIA should, by industry standards, increase CalTrain ridership to the Airport by 50 percent.

Response. Please refer to Response 4.9 for a discussion of the CalTrain connection to the ALRS, and to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- 32.106. The plain fact is that the removal of the forced transfer onto BART in order to access SFIA by public transit from the south will have significant repercussions. BART patronage will be reduced by thousands of riders, the Millbrae-SFIA portion of the wye will be rendered useless and not worth building, and CalTrain patronage will be substantially increased. The rule of thumb in the transportation planning industry is that every mid-trip transfer cuts patronage by 50 percent. A full and honest discussion of this proposal is essential.

Response. Please refer to Response 18.12 for a discussion of such industry standards.

- 32.107. The clear point is that BART to the Airport is not developing new and significantly increased transit ridership (remember, BART will be only 4.2 percent of the average daily trips to SFIA), but robbing existing transit trips from Caltrans, SamTrans and van shuttle services. Why should over one billion dollars in public funds be committed to a shell game of shifting transit riders from local systems to BART?

Response. Please refer to Response 18.13 for a discussion of the increase in transit patronage to the SFIA under the BART build alternatives.

- 32.108. In a classic case of robbing Peter to pay Paul, the Supplemental DEIR/DEIS does not discuss the financial impacts of the 21,700 riders who will supposedly transfer from CalTrain to BART. How much fare revenue will CalTrain lose under BART's transfer scenario?

Response. Please refer to Response 22.6 for a discussion of transfers between CalTrain and BART.

- 32.109. BART project that 21,700 riders who will supposedly transfer from CalTrain to BART at Millbrae, a ludicrous concept. This is over 55 percent of the CalTrain daily ridership. While 4,200 of these trips are forced transfers onto BART in order to access SFIA, there is no reason whatsoever for the remaining 15,700 CalTrain riders to transfer on to a system with much higher fares, and a longer, slower route into San Francisco with more station stops.

Response. Please refer to Response 22.6 for a discussion of transfers between CalTrain and BART.

- 32.110. There has been much discussion in various quarters about the inappropriate modeling being used to predict these trips, and the many questionable "adjustments" which have been made in order to make the numbers look better for BART.

If this is a time-sensitive model, the projected transfers make little sense, since CalTrain to the downtown area (even with Municipal Railway connections) is faster than BART. If this is a cost sensitive model, why would anyone transfer off CalTrain onto a much higher cost BART system? A minimum surcharge of 65 percent has been proposed in San Mateo County, and in reality a surcharge of 250 percent might be on the horizon. Finally, this mass exodus to BART is a mid-trip transfer, the transfer most likely to kill a transit trip in the first place.

The only way BART can force this many transfer off CalTrain is to force termination of CalTrain service in Millbrae, either through sever curtailment of overall service or excessive train turnbacks at that point. Why would CalTrain be willing to agree to such a procedure?

Response. Please refer to Response 6.11 for a discussion of travel time on BART compared to CalTrain. Please refer to Response 22.6 for a discussion of transfers between CalTrain and BART. Decisions on fares, including fares involving transfers between BART and CalTrain, would be made by the JPB and SamTrans in conjunction with BART.

- 32.111. If you accept the BART assertion that 21,700 transfers will occur, then BART's DEIR/DEIS must accurately assess the lost revenues to CalTrain, and how those lost revenues affect San Mateo County's ability to subsidize ongoing BART operations.

Response. The environmental documents do not, and are not required to, discuss revenues to other transit agencies. Please refer to Response 6.67 for a discussion of SamTrans' ability to support the operations benefiting San Mateo County residents.

- 32.112. The BART environmental documents do not discuss the financial impacts of taking over the backbone of SamTrans service, commute routes into San Francisco. SamTrans commute routes 7B, 7F and 5M carried an average of 19,600 passengers each weekday during September, 1995...a full one-third of all SamTrans patrons. While not all of these route's patrons go all the way into San Francisco, the higher commute fares constitute SamTrans most reliable and substantial fare revenues. The downtown San Francisco portions of these lines would be abandoned as redundant once BART is functional.

As with CalTrain service, SamTrans patronage and fare revenues would be decimated by BART. The most lucrative portions of SamTrans' route system would be gutted. SamTrans bus service would have to be limited to BART feeder routes, and SamTrans overall would not have the revenues necessary to support SamTrans, CalTrain and BART simultaneously.

Response. Please refer to Response 18.15 for a discussion of the effects on SamTrans bus service and subsidies thereof, and Response 22.6 for a discussion of transfers between CalTrain and BART.

- 32.113. The words "van shuttle" barely appear in BART's documents, yet by survey 18.7 percent of all SFIA air passengers utilize van shuttles. This on-call public transit service would also be usurped by BART, shifting but not creating new transit users. BART does not discuss how many shuttle patrons would shift to BART.

BART does not choose to indicate how it will cannibalize van shuttle services. Indeed, BART does not even mention van shuttles, although they carry more air passengers per day now than BART will carry when and if BART is complemented to SFIA.

BART does not even explain how this valuable, privately owned mass transit element is subsumed into their tables. Are vans included under busses? Under auto trips? Why aren't they given their own category, especially since van shuttles provide door-to-door service for more air passengers than BART will, and with no capital costs or operating subsidy to be paid from public taxpayer funds?

Response. Please refer to Response 18.16 for a discussion of transit estimates of shuttle service to the SFIA.

- 32.114. BART does not discuss the surcharge levels necessary in San Mateo county to support BART operations. The minimum percentage mentioned by SamTrans staff is 65 percent. In other words, a BART trip which costs one dollar elsewhere would cost \$1.65 in San Mateo. What impact would this extreme surcharge have on BART and other transit patronage, in light of BART's somewhat ridiculous claim that its San Mateo line will break even at the farebox.

In order to remain solvent, SamTrans is discussing an even higher surcharge than at the Colma station; staff has mentioned 65 percent. Even at this excessive rate, this surcharge is extremely unlikely to produce a 100 percent rate of farebox return.

Response. Please refer to Response 6.67 for a discussion of SamTrans' capacity to support its portion of the project, and Responses 9.19 and 6.71 for a discussion of surcharges.

- 32.115. BART presently operates at a 50 percent rate of farebox return. Therefore, you would need a 100 percent surcharge to get up to a break-even point. However, a doubling in fares would drastically reduce patronage. This vicious circle would continue, until you perhaps hit a level of 150 percent surcharge: a BART trip costing \$1 elsewhere would cost \$2.50 in San Mateo County.

Response. Please refer to Response 6.71 for a discussion of the level of surcharge that SamTrans may choose to impose.

- 32.116. Crucial to the capital and operating funding of BART is the capacity of its local partner, SamTrans, to support BART without bankrupting its local bus and rail services. BART is precluded by state law from investing any of its moneys in the SFIA Extension. Yet, it does not discuss the financial capacity of SamTrans. One crucial question is the unrealistic financial plan presented by SamTrans staff, in order to fund BART. Sales tax funds are the single largest revenue source for SamTrans. The increase in sales tax revenues last year was barely 2 percent, while the Federal Reserve Bank projects 3 percent growth in local sales tax revenues. Yet, SamTrans projects an unrealistic 5 percent annual increase in sales tax revenues to the year 2010. If sales tax revenues average an increase of 3 percent over the next 10 years, an ambitious assumption, SamTrans will have an accumulated 10-year shortfall in revenues over \$52 million!

Response. Please refer to Response 6.67 for a discussion of SamTrans' capacity to support its portion of the project.

- 32.117. While section 6.1, Financial Feasibility, of the Supplemental document asserts that it provides a "proposed financing structure," that financial structure is only a discussion of the various capital funding sources BART hopes to raid. The DEIR/DEIS needs a full and realistic discussion of operating costs and the revenue sources which will pay for those costs. Furthermore, SamTrans, the local partner responsible for operating cost shortfalls, must disclose via the DEIR/DEIS a realistic financial plan for maintaining SamTrans and CalTrain, while also funding BART's capital and operating costs.

Response. Completing a financial plan is a process that parallels the environmental process, and BART, SamTrans, MTC, and FTA are working closely with other agencies to bring all required resources together to cover the capital costs of the LPA. The proposed financial plan shown in the DEIR/SDEIS reflected the general level of detail before an LPA, with its associated conceptual cost estimates, was selected. A revised financial plan based upon the Aerial Design Option LPA is shown in Volume I of this FEIS/FEIR. A detailed financial plan will be presented as soon as it is complete.

- 32.118. SamTrans' present financial plan is a recipe for disaster. The growth of sales tax funds, the single largest revenue source for SamTrans, is grossly overestimated. Meanwhile, the loss of farebox revenue due to BART on both SamTrans and CalTrain is not even discussed.

Response. Please refer to Response 6.71 for a discussion of SamTrans' collection of fares and surcharges to cover operating costs.

- 32.119. The cumulative impacts of these dire financial signals, which BART neglects to discuss in its environmental documents spell severe financial problems for SamTrans. Consider the cumulative impacts of (a) sharply lowered farebox revenues as BART captures SamTrans and CalTrain riders, (b)

revenues shortfalls from unrealistically high sales tax projections, (c) further lowering of farebox revenues due to high surcharges, and (d) the rapid and continued loss of federal operating subsidies, and (e) state transportation funding shortfalls.

Response. Please see Response 18.20 for a discussion of regional financial trends and considerations.

- 32.120. There is no question SamTrans and CalTrain will lose revenues to BART. The Federal Reserve Bank knows a lot more than SamTrans staff about projected sales tax revenues. The effect of high surcharges is unclear, but decidedly negative. It is a certainty that federal operating subsidies will disappear within the next few years. This year, the California Transportation Commission announced a \$570 million shortfall in funds for previously committed projects.

Add all this up, and local funding for BART capital and operating costs is non-existent. SamTrans will have enough problems just keeping their bus system and CalTrain afloat. This information is not discussed in the present DEIR/DEIS documents; such financial analyses are critical for setting a proper financial context for BART's proposed project.

Response. Please refer to Response 16.27 for a discussion of the commitment of the California Transportation Commission to the project, and Response 6.67 for a discussion of SamTrans' ability to support its portion of the project, and Response 9.19 for a discussion of the effect of a surcharge on patronage.

- 32.121. Once again, the cost effectiveness index cited in the CCAG comments indicates that BART is from twice as high as the maximum indices usually acceptable to FTA.

It is clear that BART is determined to build the most expensive project for itself, clearly ignoring the fact that their proposed project generates little new transit ridership, and possesses a grossly inflated cost.

Response. Please refer to Response 6.76 for a discussion of the cost-effectiveness index, and the fact that there is no "standard" that must be achieved.

- 32.122. Alternative II capital costs are one-third of Option "X" meanwhile delivering 90 percent of the transit ridership to SFIA, by BART's own figures. Alternative 5B has a capital costs of several hundred millions of dollars less, meanwhile delivering essentially the same transit ridership.

Response. Please refer to Response 32.7 for a discussion of transit boardings. Please also refer to Response 18.22 for a discussion of the proposed project.

- 32.123. It is obvious BART wishes to build a monument to itself and various politicians, rather than implement the most cost-effective project. As previously noted, Alternative II delivers close to 90 percent of the transit trips to SFIA at one-third the cost, while another alternative, 5B, is also substantially more cost-effective than Option "X."

Response. The commentator's support for implementation of the most cost-effective project available is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. The commentator is also referred to Response 26.6 for an explanation why BART service is proposed to be extended south of the SFIA.

- 32.124. Alternative 5B costs \$250 million less than Option "X," but delivers essentially the same transit return. Its CEI is \$19.41, substantially lower than the \$26.12 of Option "X." It would provide for a true intermodal station, plus save many millions of dollars. Why isn't it the Preferred Alternative?

Response. The commentor's support for Design Option V-B is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. The commentor is also referred to Response 26.6 for an explanation why BART service is proposed to be extended south of the SFIA. Please see also Response 32.28 for a discussion of cost reduction and resulting impacts.

- 32.125. The comparison of Alternative II operating costs versus Option "X" operating costs has likewise been omitted. Option "X" annual operating costs are estimated by BART at \$308.2 million per year, while Alternative II operating costs are estimated at \$250.6 million annually...a difference of \$57.6 million. Over 20 years, Alternative II saves \$1.15 billion in operating costs.

Response. The commentor is incorrect in stating that operating costs of Option X are \$308.2 million per year. This is the cost of operating the entire BART system, including the SFIA, Dublin-Pleasanton, and Pittsburg-Antioch extensions. The annual operating cost of Alternative II (the existing BART system including the Colma extension) is estimated at \$250.6 million.

Please refer also to Response 6.71 for a discussion of operating costs of the BART extension.

- 32.126. While it is the right of various decision making bodies to choose badly, or choose expensively, it is not the right of those bodies to deliberately withhold information from the public. The Environmental Impact Record was created precisely to air relevant information on proposed projects.

Response. The commentor is referring to information on the operating costs of various proposed alternatives. Financial information and analysis related to the Aerial Design Option is discussed in Chapter 6 of the FRDEIR/S#2DEIS. Financial information relating to all project alternatives is discussed and compared in Chapter 6 of the DEIR/SDEIS. Although not required to be included in these documents under CEQA and NEPA, these discussions provide the public and decision makers with estimated capital costs, and operations and maintenance costs associated with each proposed alternative. As it is developed, further financial analysis will be made available to the public and the decision makers prior to a final decision on the proposed project.

- 32.127. Once again, BART does not provide a context for its costs, in this case operating costs. Alternative II, by BART's own projection buried in Table 2.3-2 in the January document, has an annual operating cost of \$250.6 million; the Supplemental DEIR/DEIS notes that Option "X" has an annual operating cost of \$308.2 million. It does not note that this is an annual differential of \$57.2 million, and a potential savings of public funds of well over one billion dollars, over a 20-year period.

Response. Please refer to Response 32.125 for a discussion of operating costs.

- 32.128. If Alternative II has capital costs one third those of Option "X" and can generate savings of well over one billion dollars in operating costs over a 20-year period, and is far less environmentally intrusive, and delivers 90 percent of the transit riders to SFIA, then why isn't it a unanimous, ringing choice of decision making bodies? Because BART is allowed to conduct its own environmental process, self-select its own most expensive project, and then pressure others such as SamTrans into paying for it. It is, unfortunately, a classic case of the fox guarding the hen house.

Response. The commentor's support for Alternative II is acknowledged. Please refer to Response 5.3 for a discussion of the LPA selection process.

- 32.129. Table 6.7 of the Supplemental document is yet another classic example of BART withholding data which would make its preferred project look bad. Alternative II is partially included, with an initial revelation that its annualized capital costs are less than one-fifth those of Option "X."

Response. Please refer to Response 32.99 for a discussion of the capital costs of Alternative II and of the proposed project.

- 32.130. Later in [Table 6.7] the annual operating and maintenance costs are recalculated with a different set of numbers which bear no relationship at all to the annual O&M numbers in Table 6-2...yet another example of inconsistent and contradictory numbers...but show Alternative II as lower once again. It also shows Alternative II as providing 99 percent of the annual transit trips as Option "X." Will any of these numbers ever match?

Response. The operations and maintenance figures used in the calculation of the cost-effectiveness index is, appropriately, an "annualized" figure. An annualized operations and maintenance (O&M) cost is the result of applying an expected life, measured in years, to each element of the project. Clearly, a one-year O&M figure would not be appropriate for a calculation of cost per new transit rider.

- 32.131. When it comes to calculating the Cost Effectiveness Index, all of the crucial categories for Alternative II are labeled "n.a.". The critical categories are supposedly based on change from the TSM alternative. In that case, TSM ought to be categorized as \$1, rather than n.a.

Response. The cost-effectiveness index (CEI) compares a project to the TSM Alternative in all cases. The calculation of the CEI, as shown in the environmental documents, follows the requirements of FTA. No substitutions of values are appropriate, and none were made.

- 32.132. A far better approach would be to develop a CEI which includes the TSM alternative, rather than treating it as a "n.a." baseline. The true baseline is the "do nothing" case. The reality of the situation is that Table 6-7 obscures the fact that Alternative II is far more cost effective than Option "X," or any of the BART options.

Response. There have been many suggestions made to the federal government about improvements to the CEI calculation. BART and SamTrans, however, were required by FTA to follow that agency's guidelines in preparing the information shown in the environmental documents for the BART-San Francisco Airport Extension. Therefore, in accordance with FTA guidelines, each BART build alternative is compared to the TSM Alternative. Please refer to Response 6.76 for a discussion of CEI calculations.

- 32.133. BART, as all public transit systems, will only recover a fraction of its costs via farebox revenue. SamTrans is responsible for covering operating deficits. Where will funds come from to cover operating costs? When will BART begin discussing these issues as part of its financial analysis?

Response. Please refer to Response 6.71 for a discussion of SamTrans' plan for covering operating costs, and Response 9.19 for a discussion of surcharges.

- 32.134. In the short run, capital costs of a project such as Option "X" are examined closely, with decision making bodies and the public seeing the money coming from "somebody else"...the federal government, state government, the Airport, and so on. Since it's someone else's money (although in reality it is yours and my taxes) a project such as this one seems like a bargain, like the locals are getting away with something.

Response. The financial plan presented in Chapter 6 of the FRDEIR/S#2DEIS clearly presents the levels of responsibility of each participating entity. The project would not be undertaken without agreement among funding entities on relative shares and security of each participating partner.

- 32.135. There are significant costs omitted from BART capital cost estimates. First, it is BART's intention of finance through borrowing the one billion dollars of construction. What are the costs, to the nearest

tens of millions of dollars, of this financing? This is another question which BART staff refuses to answer. The San Francisco International Airport has committed \$120 million of its expansion to traffic mitigation measures, via a Memorandum of Understanding with CCAG. BART, on the other hand, refuses to even estimate appropriate mitigation costs. It prefers to identify serious environmental impacts then offer to pay a "fair share" of the costs. Use of the phrase fair share is disingenuous, to say the least, given the massive environmental impacts generated by BART. Between the financing and mitigation costs, it is very likely that the supposed \$200 million savings generated by Option "X" will disappear. It is the responsibility of BART to provide honest and complete cost figures to the public.

Response. Please refer to Response 6.75 for a discussion of the project financial plan, and Response 18.27 for a discussion of BART's contribution to environmental impacts.

33. ASSAD, RAFIK

- 33.1. I [am] one of the many people who I know is very much in favor of the planned BART–San Francisco Airport Extension.

Response. The commentor's support for the BART–San Francisco Airport Extension is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selection of the Alternative VI Aerial Design Option as the LPA.

34. BELKNAP, ERLYS

- 34.1. As a resident of Bayside Manor, when the Garden Lane apartments are removed for a parking garage, we would like a solid wall built behind the houses on Aviator's north side canal, thus starting closure on the bridge so traffic cannot come across. This would give us one entrance and exit at the Hillcrest underpass.

Response. BART would work with the City of Millbrae and neighborhood groups to develop the final designs for access to Bayside Manor. The intent of the current plan is to provide a single access point at Hillcrest Boulevard.

35. BISSON-BARNES, ALICE

- 35.1. The...Airport Station is an atrocity and a terrible waste of taxpayer dollars....Having four BART lines join, and even cross over among themselves, fifty feet above Highway 101 is unconscionably absurd.

Response. The commentor's opposition to the Aerial Design Option LPA is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the LPA at the close of the public review period of Volume II of the FEIR/FEIS. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Volume I of the FEIR/FEIS for an explanation of BART's pursuit of an aerial alignment into the SFIA.

- 35.2. It is a genuine concern of the Belle Air residents that we will indeed be the staging area for rescue attempts and triage when the next major earthquake strikes and portions of BART fall onto the highway and into OUR wetlands.

Response. BART Seismic Design Criteria require that all structures built under the BART extensions program be designed to resist the ground motions caused by the maximum credible earthquake (MCE), which is the maximum level of motion anticipated to occur within the project area. Adherence to these criteria is intended to ensure that all BART transit structures are built with sufficient ductility to

undergo the effects of the MCE without significant damage. This policy is more conservative than standard design codes, which require that buildings be designed to protect human life during a major earthquake, but not necessarily to maintain the operational viability of the structure. As part of the existing BART Seismic Design Criteria, seismic design data have been developed for soil types along the project corridor. In addition, site-specific geotechnical studies will be performed in the vicinity of the SFIA in order to develop supplemental seismic design data for structures on these sites. The supplemental data will be incorporated into the final design of structures in this area. Please refer to Section 6.2 in Chapter 3 of the DEIR/SDEIS for additional information regarding seismic safety.

- 35.3. This new plan will make Lomita Park and Belle Air the closest thing to hell on this earth. The 800 piles that will be bored, school children dodging thousands of truckloads, limited emergency access, inadequate soundwalls, unsightly construction and noisy, obnoxious operations will not only impact our quality of life, they will destroy our lives.

Response. The proposed project would create construction effects, such as noise, truck traffic, and visual impacts, as documented in Section 3.13 of both the DEIR/Technical Appendix and FRDEIR/S#2DEIS. Similar construction activities have been performed in proximity to residents in other communities and have been successfully completed despite such impacts. As with the previous BART extensions, BART will work with local residents through community service centers or other local offices where concerns regarding construction impacts can be raised.

Noise mitigation measures have been identified that would reduce significant noise impacts to the Belle Air and Lomita Park neighborhoods to below a significant level. Please refer to Response 11.3 for a discussion of the truck haul route from the BART–San Francisco Airport Extension laydown area in the vicinity of the Belle Air neighborhood, and the noise-related mitigation measures which include sound walls.

The current San Bruno CalTrain Station would be temporarily relocated under the I-380 highway structure. The space under the structure would be leased from Caltrans to provide an equal number of parking spaces as currently exist at the San Bruno CalTrain Station. Primary access to the station would be from San Mateo Avenue. The final station layout and services to be provided by SamTrans will be coordinated with the City of San Bruno and SamTrans.

Construction staging areas would be fenced, where possible, to provide security and reduce visual impacts. BART activities would not obstruct emergency access routes. Also, as a matter of standard practice, BART would notify all local jurisdictions prior to significant construction activities on local roadways.

36. **BRACKER, JESSIE**

- 36.1. Alternative VI (Tunnel) and Alternative [VI] Aerial travel two different routes all through the northerly and mid section of Millbrae as far south as Bayside Manor which puts Lomita Park School, a great many residents, and endangered species as having serious significant impacts that this document considers to be the same for comparison as Alternative VI Tunnel falsely, which must be corrected.

Response. The commentor is correct in stating that the Alternative VI Tunnel and Aerial Design Options utilize different routes through the City of Millbrae. No “new” environmental analysis is required, since the impacts associated with the Alternative VI Tunnel Option were previously examined in the DEIR/Technical Appendix. The impacts associated with the Alternative VI Aerial Design Option were analyzed in the FRDEIR/S#2DEIS. Although there are some impacts common to both Alternative VI options, there are also differences that can be determined by comparing the analyses of these options in their respective documents.

- 36.2 In Chapter -CEQA and NEPA Topics - the two alternatives are not compared correctly....the necessary filling of flood lands are not even mentioned, which causes a very important complication which needs listing of detailed impacts because of probable seismic shaking and liquefaction during an earthquake; destroying of habitat of three endangered species, and also possibility of direct cause of flooding in airport park subdivision...

Response. Please refer to Response 36.1, above, for a discussion of the comparative impacts of the Alternative VI Aerial Design Option and the Alternative VI Tunnel Option. The filling of floodlands is not mentioned in Chapter 4 of the FRDEIR/S#2DEIS because this issue is not considered an unavoidable, adverse impact or an area of controversy. Soils susceptible to liquefaction within the project right-of-way will be stabilized. Liquefiable materials beyond project limits are the responsibility of the jurisdictions governing those areas. The commentor should address appropriate concerns to such jurisdictions.

Please refer to Section 3.6, Geology, Soils and Seismicity, of the FRDEIR/S#2DEIS, for a discussion of seismic shaking and liquefaction. Flooding concerns are analyzed in Section 3.8, Hydrology and Water Quality, of the FRDEIR/S#2DEIS. The commentor is incorrect in stating that the issue of habitat destruction of three endangered species is not considered. (There is one federal- and state-listed endangered species, the San Francisco garter snake (SFGS). The California red-legged frog has been federally listed as threatened, and the San Francisco forktail damselfly is currently listed as a "Species of Special Concern.") Specific impacts to endangered species habitat associated with the Alternative VI Aerial Design Option are analyzed in Section 3.7, Biological Resources, of the FRDEIR/S#2DEIS. In addition, page 4-3, Section 4.6, Areas of Controversy, in the FRDEIR/S#2DEIS lists "Biological Issues" as an area of controversy identified at BART, SamTrans, and San Francisco Airports Commission meetings.

- 36.3. "Clearing of blackberry bushes will be done by hand" - and- "No heavy equipment should be used in this area" Yet it is the same flood land that must [be] filled in order to build the BART tracks in many cases. Surely they do [not] think the land can be filled by hand?

Response. The clearing of blackberry bushes would be done by hand because this area represents important cover habitat (hibernacula) for the SFGS. Hand clearing would result in fewer impacts to the snake than mechanical clearing (i.e., grading). Blackberry bushes would be cleared after the snakes come out of hibernation. Once the bushes are cleared, snakes would be trapped and removed from the area. The area would be filled only after the snakes are removed. The filling of the area is required to support the proposed mainline tracks and would be accomplished using earth-moving equipment.

- 36.4. On page 1-6, 3rd paragraph, last sentence, reads "The environmental setting is not described for each subject area since it is the same as that presented for Alternative VI in the DEIR/SDEIS."...This is definitely not a true statement.

Response. The sentence referenced by the commentor appears on page 1-3, in the second full paragraph of Chapter 1, Introduction. The statement contained in this sentence is accurate. The "environmental setting" described in the sentence refers to the existing conditions along the Alternative VI alignment for each subject area. The existing conditions of the Alternative VI Aerial Design Option and the Alternative VI Tunnel Option are the same. However, the environmental impacts associated with each option vary in some cases due to differences in design and alignment. Please refer to Response 36.1 for further discussion of the environmental impacts of the Alternative VI aerial and tunnel options.

- 36.5. Since the airport and BART have decided upon design Option Q for the airport station why doesn't BART go right into the airport and right back out on the same tracks as MARTA does in Atlanta, Georgia Airport thereby saving over. \$100 million more while serving the airport with more trains....

Response. The commentor's support for a spur line into and out of the airport without a south leg to the BART/CalTrain Millbrae Station under the Aerial Design Option LPA is noted. A BART spur line to the airport without service to Millbrae was reviewed and rejected during both the AA/DEIR/DEIS study by the Metropolitan Transportation Commission (MTC) and during the scoping process for the DEIR/SDEIS. A description of other alternatives considered can be found in Section 2.4, Chapter 2, Volume I of this FEIR/FEIS.

The Aerial Design Option LPA into the airport includes a tailtrack located south of the Millbrae BART/CalTrain Intermodal Station rather than at the airport.

BART criteria requires a tailtrack for turning back trains at end-of-the-line stations. An east-west spur line would extend through the planned Airport International Terminal and through the existing airport terminal. Without a turnback, a breakdown of a given train would cause backups during at least three peak periods each week. In addition, for each such incident, at least one train would need to have its passengers unloaded at the San Bruno BART/CalTrain Station, and the waiting train(s) would need to be turned back towards Daly City to remove the broken train from the track. The appropriate number of tracks at terminal points is critical to the smooth operation of train flow and storage, as well as for failure management.

Without a tailtrack, BART would only be able to sustain about five-minute headways, which would violate the 2.25-minute peak-period threshold criteria established in the Screening of Alternatives Report. Rebuilding the existing airport terminal in a new configuration is impractical, cost prohibitive, and would have significant impacts on the airport's landside and airside operations. The commentor is referred to the August 1993 BART–San Francisco Airport DEIR/SDEIS Screening of Alternatives Report for further discussion regarding the spur into the airport alternative.

- 36.6. This aerial Alternative VI will...cause...much worse air quality and will put safety and welfare in jeopardy for a great many people in Millbrae! -- plus the added expense when BART was only supposed to go to San Francisco International Airport.

Response. The Alternative VI Aerial Design Option would not produce more numerous or more severe air quality impacts than the other BART build alternatives, but would, in fact, result in operational and construction-related air quality impacts comparable to those predicted under the other build alternatives. The Aerial Design Option, as all of the BART build alternatives, would improve regional air quality by reducing vehicle miles traveled by 485,000 per year in 2010.

Air quality impacts of the Aerial Design Option LPA would be similar to those associated with Alternative VI. As shown in Table 3.10-6 of the DEIR/SDEIS, the eight-hour net carbon monoxide (CO) concentrations near roadway intersections under Alternative VI would be lower than those under four of the other five BART build alternatives. Likewise, Tables 3.10-8 through 3.10-10 of the DEIR/SDEIS show that predicted one-hour and eight-hour cumulative CO concentrations near roadway intersections under Alternative VI would be comparable to those under the other build alternatives. As discussed on page 3.10-7 of the DEIR/SDEIS, all build alternatives would result in approximately equal regional vehicular pollutant emissions.

As shown in Table 3.13-3 of the DEIR/SDEIS, construction-related emissions under Alternative VI would be greater than those under the other BART build alternatives. However, the greater emissions under Alternative VI are due strictly to the larger area over which construction would occur (calculation of construction-related emissions is based on the area of construction activities; please refer to the Air Quality Technical Report, Chapter 3, for more information). The resulting airborne concentrations of construction-related pollutants would be comparable to those under the other BART build alternatives.

The safety and welfare of Millbrae residents would arguably be enhanced by direct access to a regional transit system and by the opportunity to travel on a safe and reliable form of transportation. In addition, extending the alignment to Millbrae would provide better access to the SFIA for CalTrain passengers traveling north than an intermodal station in San Bruno, since there are no plans for CalTrain to be rerouted closer to the terminal area.

The SFIA remains committed to participating in the BART extension as a mechanism to provide mass transit to airport passengers and employees, and as a means to reduce the traffic associated with a predicted 70 percent increase in air passengers between 1990 and 2006. Please refer to Response 12.27 for a discussion of SFIA's commitment.

- 36.7. Alternative VI Aerial cannot be an acceptable, feasible, cost efficient and viable plan unless all Millbrae trackage and station plans are eliminated. Significant costs and impacts that cannot be mitigated would be eliminated by so doing. An underground transfer connecting station should be added to the present San Bruno CalTrain station connecting to the ALRS since the middle of the airport lands is just across the freeway from there and that would be the quickest and least confusing way for anyone coming from the south to get directly to wherever they need to go on airport lands.

Response. The commentor is expressing a preference for the Aerial Design Option modified to terminate north of Millbrae, so that the Millbrae Avenue Station would be eliminated. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for a discussion of the selection of the LPA.

In addition to public input, the BART and SamTrans boards also considered the costs associated with the various alternatives. Please refer to Chapter 6, Financial Analysis, of the FRDEIR/S#2DEIS for a discussion of the costs associated with the Aerial Design Option.

The commentor also states a preference for a CalTrain-Airport Light Rail System (ALRS) subway transfer station at the site of the existing San Bruno CalTrain Station. This site does not contain sufficient acreage for an ALRS-CalTrain station, ALRS turnback, and parking garage. The existing site of the San Bruno CalTrain Station also lacks good access to Highway 101. Commuters traveling north along Highway 101 would need to go through residential neighborhoods to access the station. For these reasons, the existing San Bruno CalTrain Station is an impracticable and infeasible option as a site for an ALRS-CalTrain station.

- 36.8. On page ES-4, ES-5 and ES-6 of the BART-San Francisco Airport Extension Document - under - Impacts Specific to Alternative Design Option [VI], Geology, Air Quality, Public Health and Safety Impacts as already identified under Alternative VI Tunnel if significant - this is not true!

Response. The section referenced by the commentor is intended to present new impacts that were not already identified under the Alternative VI Tunnel Option. Issues such as Air Quality and Public Health and Safety do not appear on the list because the impacts in these areas would be the same under the Aerial Design Option as those previously identified under Alternative VI.

- 36.9. [On page ES-4, ES-5 and ES-6] Long Term Effects - Visual Quality - Please add: "and also obstruct views from all residents of Marina Vista/North Millbrae going in or going out of the area. The open space of the CalTrain right-of-way will be lost.

Response. Although North Millbrae residents do not have as clear a view of the open space as do the residents of the Marino Vista neighborhood, the view may be obstructed while entering either neighborhood from Center Street. Therefore, the following is added to page ES-5, the first bullet, at the end of the last sentence:

...and from residences entering both the Marino Vista and North Millbrae neighborhoods from Center Street.

The following sentence is added to page 3.3-3, following the last sentence of the first paragraph under Impact 6:

Views would also be obstructed from Center Street as residents enter both the Marino Vista and North Millbrae neighborhoods.

The loss of open space has been addressed on page 3.3-3, under Impact 6 of the FRDEIR/S#2DEIS. The open space area along the CalTrain right-of-way can be considered part of the larger west of Bayshore property and is covered under Impact 6. No feasible mitigation measures exist to reduce the visual effects of the aerial guideway.

- 36.10. [On page ES-4, ES-5 and ES-6] Geology, Soils, and Seismicity - please add: "and so would the BART rails and connections built on the necessary filled flood lands between easterly side of CalTrain tracks and San Felipe-Lomita Canal, even possibly subject to liquefaction.

Response. The focus of the FRDEIR/S#2DEIS is the Alternative VI Aerial Design Option to the planned Airport International Terminal. Beginning on page ES-4, the Executive Summary presents differences between key impacts for Alternative VI versus the Alternative VI Aerial Design Option. Seismicity impacts related to the at-grade mainline BART tracks, located between the easterly side of CalTrain tracks and San Felipe-Lomita Canal, would be the same as those already discussed under Alternative VI, Chapter 3, Section 6.2 of the DEIR/SDEIS. Liquefaction impacts in areas underlain by Bay Muds are addressed specifically.

- 36.11. [On page ES-4, ES-5 and ES-6] Biological Resources - Since there seems to be no reference to the amount of acreage of flood plain lands located within wetlands and wetland habitat areas that will be required I question the validity of the acreage amounts listed here for wetlands because some seem to be conflicting. Required amounts of landfill acreage should also be added to the lists.

Response. The summary of impacts on pages ES-4 through ES-7 of the FRDEIR/S#2DEIS highlights the significant impacts of the Aerial Design Option that differ from those identified for the Alternative VI Tunnel Option in the DEIR/SDEIS. The acreage of wetland habitat that would be affected by the Aerial Design Option, identified on page ES-5, was determined in the detailed wetland delineation report that was approved by the Army Corp of Engineers (ACOE). As discussed on pages 3.8-1 and 3.8-2 of the FRDEIR/S#2DEIS, the Aerial Design Option mainline tracks and aerial guideways would be located in the floodplain and would displace floodwater storage capacity, but these effects would be insignificant due to the minimal area affected. The analysis of hydrologic impacts does not specifically note whether the floodplain area affected is classified as wetlands, but this does not affect the validity of the wetland acreage figures, since they were separately verified by the ACOE.

- 36.12. [On page ES-4, ES-5 and ES-6] Short Term Effects - add: Visual quality of open space along CalTrain track will be lost, even more than under long term because the whole area will be disrupted.

Response. Please refer to the last paragraph under Response 36.9 regarding the visual impacts of the aerial guideway. The aerial structure is projected to affect the open space along the CalTrain right-of-way.

- 36.13. [On page ES-4, ES-5 and ES-6] under Biological Resources - It should be fully recognized that any attempt of changing the wetlands and endangered species habitat between the South Lomita Canal and CalTrain tracks by filling the flood plains wetlands to put BART tracks would create a hazard to safety because of possible seismic activity and there would be great risk to stability of those tracks during or because of earthquakes.

Response. BART design criteria require all track to be placed on an engineered subbase that is stabilized against liquefaction. Extensive geotechnical analysis will be performed prior to any planning and construction of aerial guideways or other track-supporting structures.

- 36.14. Page 3.7-4, 1.3: To put new permanent wetlands west of Caltrain tracks by the most flood-prone drainage spot, risking causing of floods in airport park home area, would be one huge mistake.

Response. It is unclear from the commentor's statement how placing wetlands west of the CalTrain track would increase the chance of flooding the Airport Park neighborhood. Permanent wetlands would be established in consultation with, and with the approval of, the U.S. Fish and Wildlife Service (USFWS) and ACOE. This coordination will ensure that any potential flooding issues are recognized and addressed early in the planning process. Ongoing geotechnical and hydraulic studies of this area will be conducted to characterize the suitability of this area for wetland creation.

- 36.15. Page 3.7-5: The uplands (so-called) immediately east of P.G. and E. Substation between Bayside Manor and North Millbrae neighborhoods cannot be used as mitigation wetland site because it is already wetlands habitat area for the endangered species!

Response. A determination of jurisdictional wetland boundaries was conducted and approved by the ACOE in January 1995. The wetland delineation was based on the presence of hydrophytic vegetation, wetland hydrology, and wetland soils, as defined by the ACOE. The area immediately east of the PG&E substation that is proposed as a mitigation site is not characterized as wetland, according to the ACOE guidelines.

- 36.16. Page 3.7-7: Cumulative analysis for biological resources is...The Alternative VI Tunnel Alignment turned easterly toward airport at Euclid Avenue, in San Bruno and did not come back to CalTrain track.

Response. The tunnel in the route prescribed for the Alternative VI Tunnel Option does in fact come back and resurface at the CalTrain tracks in Millbrae south of the PG&E substation.

- 36.17. Page 3.8-2: Cumulative Analysis is---True --- Since water seeks its own level wherever it is - these are waters that are affected by high tides! Studies of South Lomita Canal were not included in Alternative VI Tunnel and therefore cannot be the same...

Response. As discussed on page 3.8-1 of the FRDEIR/S#2DEIS, the potential for increased flooding from the construction on the floodplain would be mitigated to an insignificant level. Other development which would contribute to flooding potential will need to be addressed in the general plan for the City of South San Francisco and in the SFIA Master Plan. The San Mateo County Flood Control District is the agency responsible for assuring flood control issues are properly addressed. The cumulative flooding impacts associated with the Alternative VI Aerial Design Option would be the same as for the Alternative VI Tunnel Option, including areas affected by high tides as well as South Lomita Canal (see Cumulative Analysis, page 3.8-19, of the DEIR/Technical Appendix).

- 36.18. Page 3.13-28: Construction --- 1st paragraph -- not true - The drainage of Lomita Creek approximately 500 feet north of Center St. is not concrete lined after it goes under r[ail] r[oad] tracks while going on to empty into South Lomita Canal and is a major drainage. The smaller ditch on east side of r[ail] r[oad] tracks emptying into it drains Monterey St. and Madrone St. There is a drain underneath Lomita Park school ground, then r[ail] r[oad] tracks, which drains into South Lomita Canal shortly south of airport's storm drain pump station that pumps their water westerly into the canal. During rainy season this canal is like a river.

Response. The tributary drainage ditch into South Lomita Canal just north of Center Street is concrete-lined only on the west side of the CalTrain tracks, and not as it surfaces east of the tracks on

the west of Bayshore parcel before flowing into South Lomita Canal. The paragraph the commentor is referring to follows the heading entitled "Tributary Drainages West of CalTrain Tracks" (page 3.13-27 of the FRDEIR/S#2DEIS; underline added). Impacts to the earthen portion of the tributary drainage located approximately 500 feet north of Center Street are defined on page 3.7-2 under "San Felipe-South Lomita Canal." The Aerial Design Option LPA will be designed to minimize impacts on the existing drainage systems.

- 36.19. Page 2-1: Straight through BART service to Millbrae alongside CalTrain tracks without stopping at San Francisco International Airport would be a shameful waste of transportation funds and would create a very confusing transportation system, especially since Table 2.1 - page 2-19 -shows BART going to San Bruno's Tanforan Station almost twice as often as to Millbrae and then Millbrae to the airport only one-half as often - from Millbrae!

Response. The operating plan summarized on pages 2-18 and 2-19 of the FRDEIR/S#2DEIS addresses the two major markets for the BART-San Francisco Airport Extension: 1) commuters from San Mateo County traveling to jobs in San Francisco, and 2) air passengers, greeters, and employees going to the San Francisco Airport. The BART train schedule will clearly identify which trains are bound for the airport versus those bound for Millbrae. In addition, the train destination signs inside BART stations will show the destination of each train.

- 36.20. Page 2-9 - reads in part - "a 4th track has been added," to and from SFO. How and why did this shuttle train traveling at approximately 36 miles per hour to Millbrae ever get into this Plan when SAMTRANS Buses can go 60 miles an hour from the Millbrae Station which would be much quicker to get to the Airport. People from south of Millbrae have CalTrain to get to either Millbrae, San Bruno, or even San Francisco faster, and privileged to have a seat.

Response. The fourth track discussed on page 2-9 refers to the tailtrack for the Millbrae BART/CalTrain Station, not mainline track. The BART shuttle train would take 4 minutes and 25 seconds to travel between the Millbrae Avenue and Airport International Terminal Stations. SamTrans buses, like BART cars, have speed restrictions that reduce their average speeds. There are other cars, trucks, and buses occupying the roads between Millbrae and SFIA terminals that may affect buses' travel speeds. Please refer to Response 6.11 for a discussion of CalTrain and BART travel times to San Francisco.

- 36.21. Some more comparisons of impacts that are not true and not the same as Alternative VI Tunnel are found under "Noise and Vibration", "Land Use" on pages 3.13-20, -21, -22, -23, -31, -32, -38, listed titles of Visual Quality, Community Services, Geology Soils and Seismicity, Biological Resources, and Public Health and Safety - with 3.13-20, -21 which is dangers to safety, health and welfare of people. Also Air Quality on page 3.13-38, -39 and 3.9-6, Item 12-Noise and Cumulative Analysis - also page 3.6-3, 3.7-7, 3.8-2, Hydrology and Water Quality and 3.13-1, with most of them cumulative analysis. Please correct these untrue mistakes.

Response. The impacts presented on the pages referenced by the commentor and throughout the document are prefaced by a statement that indicates that the impacts presented are different from those already presented in the DEIR/SDEIS for Alternative VI. Since the Aerial Design Option is a version of Alternative VI, only modified or new impacts are presented in the FRDEIR/S#2DEIS. Furthermore, impacts that would occur between the Colma BART Station tailtracks and Angus Avenue are not presented because they would be the same as those already identified under Alternative VI in the DEIR/SDEIS. This format is described in Section 1.3 of Chapter 1, Introduction, in the FRDEIR/S#2DEIS.

- 37.1 Page ES-5 "Long Term Effects" of Seismicity. The present structure, used for BART, should in no way be built in a seismic area like this for a Mass-Transportation System, "due to locally active faults." Only a Lightrail-Overhead-Electrical System is the solution. It can be very quick activated again, after a disaster strikes.

Response. The intent of the BART Seismic Design Criteria is to assure that critical structures remain in service after a major earthquake. Adherence to BART Seismic Design Criteria will result in a system that can be quickly brought back into operation after a major earthquake.

- 37.2. In order to make this System most efficiently to be used, it has to lead from downtown S.F., using the shortest rout[e], direct into SFIA-Loop, as shown in Figure 2-B, with a future extension to San Jose.

Response. The commentor's support for an at-grade light rail transit (LRT) that follows the shortest route possible between downtown San Francisco and the airport terminal loop before continuing to San Jose is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for a discussion of the selection of the LPA. The idea of BART extending to San Jose and eventually circling the entire Bay Area is discussed in the Metropolitan Transportation Commission's (MTC) Resolution No. 1876. Please also refer to Response 37.3 for a discussion of an LRT system serving San Francisco, SFIA, and San Jose.

- 37.3. Stations at all adjacent shopping-malls or business-centers should be provided. The transfer-station to the present BART system should be in downtown S.F., and not in Daly City....All additional transfers and delays have to be avoided. Long travel-routes, like through Daly City and west-S.F. etc., are a loss of time and inconvenient.

Response. The commentor is advocating an at-grade LRT with an overhead electric power source that follows the shortest route possible between downtown San Francisco and the airport terminal loop. This LRT system would stop at all adjacent shopping malls or business parks and interface with BART in downtown San Francisco.

Under the Federal Transit Administration's (FTA) Major Capital Investment Planning Process, a Phase I - Systems Planning study establishes the corridor where an alternatives analysis would be performed. A Phase II - Alternatives Analysis study evaluates a specific corridor. The 1985 SCR 74 Peninsula Mass Transit Study evaluated various transportation alternatives in a larger corridor between San Francisco and San Jose. The study was conducted by MTC at the request of the California State Legislature in 1984-85 and met the Urban Mass Transit Administration's (now FTA) requirements for a "systems level" analysis. The Peninsula Mass Transit Study evaluated seven alternatives, including the Alternative #3 - LRT from San Francisco to San Jose. At the conclusion of the Peninsula Mass Transit Study, no alternative was selected for advancement. Instead, MTC recommended that a joint powers agency be formed to acquire the Southern Pacific rights-of-way from San Francisco to San Jose.

In March 1989, MTC entered into a planning process with the UMTA (now FTA) to "pre-screen" mass transit alternatives on the Peninsula for advancement to an Alternatives Analysis phase.

The *BART San Francisco Airport Extension/CalTrain Upgrade Pre-Alternatives Analysis/DEIS* evaluated six alternatives: 1) No Build; 2) Transportation Systems Management (TSM); 3) a BART extension to an external airport station; 4) an upgrade of CalTrain; 5) light rail transit from San Francisco to San Jose; and 6) an extension of BART to an internal Airport station. MTC recommended that Alternative 5, light rail transit from San Francisco to San Jose, be dropped from

further consideration for the following reasons: cost effectiveness, financial infeasibility, and/or lack of a project sponsor. Therefore, the pre-screening of alternatives concluded that BART was the preferred mode, and the Colma-to-SFIA Southern Pacific San Bruno branch railroad right-of-way was the preferred corridor for further study.

In May 1990, the Urban Mass Transit Administration (now FTA) approved the initiation of a Phase II - Alternatives Analysis study for No Build, TSM, and BART alternatives within the Colma-to-SFIA corridor. The DEIR/SDEIS and FRDEIR/S#2DEIS are a continuation of the AA/DEIS/DEIR study, and thus criteria developed for the DEIR/SDEIS screening of alternatives focused on BART.

- 37.4. Local shuttle-busses could be used from areas which are not adjacent to the System. This way the Environmental Impact as listed, will be in general reduced or avoided. The removal of mature and old Eucalyptus trees in Millbrae and Burlingame will not be necessary or reduced.

Response. The commentor's statement that an at-grade LRT between downtown San Francisco and the airport terminal loop would avoid the removal of old eucalyptus trees in Millbrae and Burlingame is noted. Please refer to Response 37.3 for a discussion of an LRT system serving the region between San Francisco, SFIA, and San Jose.

- 37.5. The capital costs, as listed in Chapter 6, will depend on the selection of the most efficient plan.

Response. The capital cost section does not review any alternatives that approach San Francisco via the east side of the Peninsula, or any light rail alternatives. Capital costs range from \$847 million to \$1,269 million for Alternative VI. The Aerial Design Option LPA is estimated to cost \$1,070 million (in 1996 dollars), or approximately \$200 million less than the cost of Alternative VI, and incorporates expected savings from using the design-build process.

38. CAMERON, CHARLIE

- 38.1. What is the track mileage from the Montgomery BART station to the new [station] to be completed and open [in] Colma BART Station [and] the schedule[d] running time [for] trains...in running that distance?

Response. The track mileage from the Montgomery Station to the Colma Station is 9.1 miles. The Colma BART Station opened for revenue service on February 24, 1996. The BART scheduled travel time from Colma to the Montgomery Station is 18 minutes.

- 38.2. In reference to the...train to plane Oct. 1995 Issue V 9 BART/SamTrans Airport...you could have put an arrow or dots to where the Airport Light Rail System goes to...

Response. The commentor's recommendation to BART regarding edits to the map showing the route of the proposed Airport Light Rail System in the October 1995 issue of "Train to Plane" is noted.

39. CANIGLIA, LYNNE

- 39.1. I am for the BART/BART extension into the airport.

Response. The commentor's support for the BART-San Francisco Airport Extension is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

- 40.1 We are unanimous about the following concerns when and if BART may be coming through San Bruno. No!! Cut-and-cover construction (Bore tunneling only, within the borders of San Bruno! No! Aerial construction, therefore no need for a 14' sound wall to control vibration and sound of BART trains. No! Retained cut.

Response. The commentor's support for the BART extension with a bored tunnel configuration through the City of San Bruno is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Response 24.1 for a discussion of why the bored tunnel construction method through San Bruno is considered infeasible.

- 40.2 A guarantee that construction will be done in day light hours, no longer than 8 hours per day. Every phase of construction must be posted and approved by city planning department and police departments to mitigate traffic and lessen daily disturbance of the city's daily routine.

Response. City planning departments and police departments will be able to review detailed construction plans to assure communities that construction impacts will be minimized as much as is practical. BART standard construction hours are between 7 A.M. and 7 P.M. This duration is necessary for construction trades to follow each other sequentially during the work day. Each construction trade normally works an eight-hour day, some starting and ending their shifts before others. Please refer to Response 6.60 for a discussion of coordination of construction with affected jurisdictions, and Responses 6.62 and 6.64 for a discussion of coordination efforts to minimize construction-related disturbances to affected communities.

41. DITTNER, DEBBIE

- 41.1. I oppose the BART proposal. I support Dennis Queen's proposal.

Response. The commentor's support for Dennis Queen's proposal and opposition to the BART proposal is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Section 1.3 of the DEIR/SDEIS for an explanation of the need for the BART-San Francisco Airport Extension project.

Since 1972, over 90 alternatives in the San Francisco to San Jose corridor have been evaluated. Section 2.5, Alternatives Selection Process, of the DEIR/Technical Appendix summarizes how alternatives under study were determined, through an extensive public process, to be the only feasible build alternatives that accomplish project objectives. Please refer to Response 23.2 for a summary of the history of alternatives considered in the San Francisco to San Jose corridor.

42. DORMAN, LORI

- 42.1. I strongly support the addition of BART to SFO, Option B (inside the new terminal).

Response. The commentor's preference for the Aerial Design Option B is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Volume I of the FEIR/FEIS, which explains why BART is pursuing an aerial alignment into the SFIA.

- 43.1. My home will directly be impacted by the BART parking/storage facility...we are a family oriented community where all neighbors are proud of their homes and feel very safe. We all feel this will change with BART.

Response. Homes on Hamilton Lane would be approximately three-quarters of a mile from the Millbrae Avenue Station and would not likely be affected by spillover parking or station-related activity.

The analysis of impacts on local police, fire, and emergency medical services was based on two sources of information. First, the local jurisdictions, including the Millbrae police and fire departments, were contacted to obtain information on current service levels and capacities. Second, local jurisdictions already served by BART were contacted for information regarding actual demand imposed by BART facilities. Based on the latter source of information, it was reported in the DEIR/Technical Appendix in Section 3.5, Community Services, that local police, fire, and emergency medical services would experience an increase in calls for service. The types of calls for service are described in the DEIR/Technical Appendix on pages 3.5-8 and 3.5-9. The introduction of BART into a community does not generally result in increased criminal activity or the "importation" of crime from other areas. A BART station, like a shopping center, city park, or university, may be the site of crime, but the station is not causing an increase in the incidence of crime. Communities contacted as part of the analysis that have existing BART service have not needed to increase staff or equipment. BART cannot guarantee that Millbrae or any jurisdiction served by the proposed project would not be called upon to provide emergency response. In fact, it is clear that local support would be required. BART is committed to working with local jurisdictions to design the facilities to minimize the potential for crime and fire incidents.

- 43.2. I asked this same BART official what the noise factor was for housing near by. He assured me that we would have no additional noise. What about the hook-up and switching cars on tracks let alone maintenance station. Why is BART proposing a sound wall? Why aren't these concerns addressed?

Response. The commentor may have misunderstood the BART official's reply. The Aerial Design Option LPA would result in additional noise, but the change in noise exposure level would not be significant after mitigation. BART would construct a sound wall as mitigation where noise impacts would otherwise be significant.

- 43.3. [Have] alternative studies...been investigated to put BART along the bay or over in the industrial area....Why couldn't BART run along these area's that won't impact home and lives and still would service the working/community public. Please do not go through with these plans -do studies- look at the effect that this had made to already existing communities before you sacrifice our lives and homes.

Response. Please refer to Response 10.3 for a discussion of the LPA selection process. A brief history of previously studied alignments is contained in Response 37.3.

44. GIPE, WILLIAM

- 44.1. My comment is the need for a peninsula transfer station with Caltrain. An electrified Caltrain will benefit all the bay area; an interim connection with the present system will make a bay system.

Response. Please refer to Response 64.41 for a discussion of the need for a BART/CalTrain Intermodal Station. In addition, please refer to Response 6.8 for a discussion of the CalTrain electrification and the study of the CalTrain extension to downtown San Francisco.

45. GORHAM, WM. S.

- 45.1 This letter is to urge the BART Board of Directors to incorporate into the BART–Airport Extension a Bicycle and Pedestrian trail along the right-of-way.

Response. Please refer to Responses 8.9 and S44.4 for discussion of this issue. Please also refer to Volume I of this FEIR/FEIS for a general description of a proposed bike path utilizing the BART right-of-way.

46. GWATHNEY, MARGARET

- 46.1. The Best of Option B is its placement inside the new terminal and adjacent to the ALRS. On the whole, Option B is more attractive to the passenger.

Response. The commentor's support for Alternative VI Aerial Design Option B is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for a discussion of the selected LPA.

- 46.2. However, in your mailing, the new terminal seems completely cut off from the South Terminal, thus forcing those passengers onto the ALRS. That would be horrible. Say it isn't so!

Response. The BART airport station at the SFIA would permit passengers to access all airport terminals either by foot, from the platforms directly to each of the terminals/airline ticketing and gate areas, or by taking the Airport Light Rail System (ALRS) located directly above the BART station. Patrons wanting to go to the South Terminal would be able to either walk across the east end of the new International Terminal and go down one level to the departure level of the South Terminal or ride the ALRS around the terminal loop.

47. HARBER, MAUREEN

- 47.1. BART in Burlingame is an unwanted demon. This demon is planning to visit upon our city bringing with it chaos, noise, crime and disorganization.

Response. Under Alternative VI and the Aerial Design Option LPA, a tailtrack south of the Millbrae Avenue Station would extend 1,500 feet into the City of Burlingame. The tailtrack in Burlingame under the Aerial Design Option is described in Section 2.2, Route Description and Alignment, of the FRDEIR/S#2DEIS.

The DEIR/SDEIS investigates visual and noise impacts related to the tailtracks in Burlingame. The land uses along the tailtrack segment in Burlingame are neither visually nor noise sensitive. They are largely industrial and commercial uses flanked by eucalyptus trees on the east. The DEIR/Technical Appendix describes the absence of significant visual impacts under Impact 19 on page 3.3-90, and Impact 13 on page 3.9-85. BART speed on the tailtracks would be less than 25 mph, resulting in no significant noise or vibration impacts to buildings on either side of the SPTCo tracks. Based on the information and assessment contained in the environmental document, mitigation is not required along the tailtracks.

Compatibility of the surrounding built environment with that of the turnback/tailtracks in Burlingame under Alternative VI is addressed in the DEIR/Technical Appendix. Storage for up to 60 BART cars would not be incompatible with the surrounding industrial land uses, as described under Impact 19 on page 3.3-90.

The introduction of BART into a community does not generally result in increased criminal activity, or in the "importation" of crime from other areas. A BART station, like a shopping center, city park, or university, may be the site of crime, but statistically, crime rates at BART stations mirror rates for the communities where they are located.

48. HARRISON JR, WILLIAM

- 48.1. Design Options B and X are both ludicrous. I am most concerned about BART operating service in and out of a stub end station, particularly the amount of time it takes to reverse a train, particularly in peak hour service. Has anyone observed the amount of time it takes for BART to do that currently?

Response. Under the operating plan for the Aerial Design Option LPA, on pages 2-18 of the FRDEIR/S#2DEIS, reversing in-service trains is proposed at the Airport International Station late nights weekdays, Saturday, and all day Sunday, not during peak periods. Please refer to Response 9.17 for a discussion of the time required to reverse a train.

- 48.2. Even if the procedure were to be streamlined, it could not possibly be as fast driving through with no change in direction of the train: current practice at all non-terminal stations. Therefore, of the three options currently being considered, the current drive through alignment at SFO is definitely the most preferable from an operational/ schedule/service point of view.

Response. The commentator's preference for Alternative VI with its "drive-through" alignment at the SFIA is noted. Public input regarding the merits of different alternatives was considered by the BART and SamTrans boards in selection of the Alternative VI Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Volume I of the FEIR/FEIS, which explains why BART is pursuing an aerial alignment into the SFIA. In addition, please refer to Response 9.17 for a discussion of the time required to reverse a train at the Airport International Terminal Station under the Aerial Design Option LPA.

- 48.3. Better accommodation should be made to serve commuters/workers heading on a daily basis to the airport maintenance facility, the largest employment site in San Mateo County. They should have their own convenient station.

Response. Alternative 6, evaluated in the AA/DEIS/DEIR, included a BART station at the United Airlines Maintenance Facility. This alternative, however, was not selected as the LPA by the BART and SamTrans Boards of Directors and the Metropolitan Transportation Commission (MTC) in 1992, and is not under consideration in the DEIR/SDEIS.

There are approximately 35,000 employees at the SFIA. Approximately 60 percent of these employees work at the United Airlines Maintenance Facility or other non-terminal locations, while 40 percent work at the terminals.

The patronage forecasts produced by MTC for the BART extension indicate that 5,200 people per day would transfer from CalTrain to BART via the south leg of the aerial wye-stub to access the airport, either for employment (2,000 people) or for airline trips (3,200 people).

Of the 2,000 employees from the south, approximately 1,200 (60 percent) work at the United Airlines Maintenance Facility or other non-terminal locations and approximately 800 (40 percent) work at the terminals. The CalTrain market for employee trips to the United Airlines Maintenance Base from the south is relatively small because 1) most employees have parking available; and 2) employees work different shifts around the clock and typically commute during off-peak periods when the freeways are less congested.

- 49.1. The county wide November 3, 1987 Measure "K" election's impartial analysis by the County District Attorney stated "...The measure would authorize SAMTRANS (the San Mateo County Transit Authority) to construct BART passenger station and related facilities south...to a location near the San Francisco International Airport." The recent agreement with the San Francisco Airport for a three track interior aerial station is as "near" as a station could be to the airport and therefore any construction south of that point is in conflict with the electorate approval of measure "K" in 1987.

Response. Per the "BART-SamTrans Comprehensive Agreement Pertaining to BART System Extension," 1990, SamTrans has committed \$200 million as a capital contribution to the BART extension. At the conclusion of the Alternatives Analysis study, BART, SamTrans, and the Metropolitan Transportation Commission (MTC) chose "BART to Airport External via I-380" as the 1992 Locally Preferred Alternative (LPA). The 1992 LPA included an Airport External BART/CalTrain/ALRS/SamTrans Intermodal Station on the west of Bayshore property west of Highway 101. This alternative is no longer the LPA.

Based on the environmental information in the DEIR/SDEIS and the FRDEIR/S#2DEIS and on a preliminary evaluation of comments received, on November 28 and 29 the BART and SamTrans boards modified the Alternative VI LPA, from South of Angus Avenue in San Bruno to the end of the tailtracks in Burlingame, to incorporate an aerial design option. This option is known as the Aerial Design Option LPA. The location of the BART airport station under the Aerial Design Option LPA would be in front of the west wall at the departure level of the new International Terminal.

- 49.2. The taxpayers of San Mateo County committed \$200 million for this extension project of which \$100 million has already been paid. An exterior SFO CALTRAIN/Airport people/SamTrans (for El Camino riders) station was part of the early design.

Response. Please refer to Response 49.1 for discussion of the options considered and supported by the San Mateo County Transit Authority.

- 49.3. The aerial line could be designed to have an interfacing station above the CalTrain line and then drop to ground level on the former Market Street Railway right of way en route north to the San Bruno station. This station could serve a future East Bay/Oakland Airport along side the proposed I-380/I-238 Transbay connection.

Response. The commentor is suggesting an Airport External BART/CalTrain/ALRS Station west of Highway 101 with a new airport-to-airport BART extension on a possible I-380 to I-238 bridge. This component of the commentor's proposal was proposed and rejected during the public scoping and screening process for the DEIR/SDEIS. One of the threshold criteria for the screening report was that a proposed alternative be within the San Francisco-to-SFIA corridor in order to receive further consideration. The extension to the Oakland airport via an auto/BART bridge was outside the San Francisco-to-SFIA corridor, which violated one of the screening threshold criteria.

- 49.4. With \$200 million of local funds in the project, the Peninsula traveler from the south is entitled to have access as equal as the BART riders have coming from the northwest corridor.

Response. Peninsula travelers from south of the proposed end-of-line station in the City of Millbrae would have improved transit service, generally, and improved access to BART service, specifically, with the BART extension project. SamTrans feeder bus routes and CalTrain service to the Millbrae Avenue BART Station would improve transit options for Peninsula travelers south of the Millbrae Station. Various designs for cross-platform transfers between BART and CalTrain were analyzed and considerable attention was given to the convenience of making this transfer. Please refer to Response

20.7 for a discussion of cross-platform transfers at the Millbrae Avenue Station under the Aerial Design Option LPA and Alternative VI.

Commuters and airline passengers going to SFIA from south of the airport would have an improved transit option with the BART extension. These travelers would be able to ride CalTrain to Millbrae Avenue and take BART to the Airport International Station under the Alternative VI LPA or the Aerial Design Option LPA. Under the other BART build alternatives, CalTrain riders would transfer at a station external to SFIA to the ALRS for access into the airport. Please refer to Response 4.9 for a discussion of differences in CalTrain ridership to SFIA under the various BART build alternatives.

50. HINMAN SKINNER, JOAN

- 50.1. It is my position that the BART system should end at the Colma Station, and that any further rail transit development to the south be based on an upgraded CalTrain system within the existing right-of-way.

Response. The commentator's opposition to the BART–San Francisco Airport Extension and support for an upgrade to CalTrain is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Response 22.1 for a discussion of the alternatives and upgrades to CalTrain considered in the *CalTrain San Francisco Downtown Extension/System Upgrades Final Report*, March 1994.

- 50.2. The original Alternative VI route crosses the west of 101 parcel in relatively dry areas. The new "wy'e" alignment crosses an area of vernal ponds, canals and seasonal wetlands where in wet seasons the water is 4 to 5 feet deep! The increased impacts to amphibian life (frogs) and by extension, to the San Francisco garter snake which feeds on the frogs, are not adequately analyzed. The continued assumption that mitigation in the form of replacement habitat will work is unverifiable. Why reroute into a wet area when a dry area is available?

Response. Appropriate mitigation measures have been designed to minimize impacts to wetlands and sensitive species' habitats. All measures have been established in consultation with, and approval by, the appropriate regulatory agencies. Please refer to Responses 16.34 and 20.12 for further discussion of mitigation measures and objectives.

- 50.3. Sound in the surrounding neighborhoods becomes an increased problem with the aerial wye alignment, in that BART emerges from subway south of Angus Avenue in San Bruno and goes aerial to a height of 50' entering the wye segment. The report now admits this problem by introducing a sound wall along Huntington Avenue in the wye area. Sound walls have been used by various public agencies, most notably Caltrans, to reduce noise....However, upon checking with Caltrans you will find that sound walls are not always effective, occasionally amplifying the sound they are intended to deaden....

Response. Caltrans has demonstrated, through extensive studies, that sound walls do not significantly increase noise levels, contrary to claims reported in newspaper stories over the last several years.

- 50.4. Sometimes [soundwalls are]...so aesthetically abhorrent as to cause law suits by their very appearance. As noted at the public hearing held 11-16-95, they are also "graffiti magnets."

Response. A variety of construction techniques and materials can be used to create sound walls which are considered more aesthetic. BART sound walls will be landscaped to increase their visual appeal. In addition, as part of the design of system facilities, BART will utilize graffiti-resistant wall finishes and paint that enhances graffiti removal. When warranted, the BART Police Department will monitor graffiti activity through undercover surveillance and take appropriate action.

- 50.5. Another solution to the sound problem is to avoid removal of the mature vegetation that lines the route to the greatest extent possible. The mature eucalyptus that grow on the west of 101 parcel are very effective sound deadeners and should be retained. Staying within the original Alternative VI alignment for the aerial construction would also reduce the need for a sound wall in that BART would climb from subway in an open area, farther from homes.

Response. It is a common misconception that a row of trees or even a small grove of trees is an effective noise barrier. While vegetation does provide visual screening, a row of eucalyptus trees, as in the situation described, provides virtually no noise attenuation. Studies have shown that a thick forest of trees, at least 100 feet deep, is required to produce a significant reduction in sound. Effective noise mitigation for all proposed alternatives, including sound walls, has been presented in Chapter 3 of the DEIR/SDEIS and in Chapter 3 of the FRDEIR/S#2DEIS for the Aerial Design Option LPA.

- 50.6. The entire question of aerial alignment through the wetlands west of 101 leads inevitably to a question of seismic safety. The area is subject to Army Corp of Engineers wetland evaluation- essentially an area of older bay mud and alluvial wash. Building an aerial structure on columns in this area courts liquefaction problems. The further problem of what would happen if BART collapsed onto US 101 during an earthquake was brought up at the hearing 11-16-95.

Response. The seismic impacts regarding the Aerial Design Option are discussed in Section 6 of the FRDEIR/S#2DEIS. A site-specific geotechnical investigation will be performed to assess the soil conditions in the vicinity of the aerial alignment on the wetlands west of Highway 101. As part of that investigation, the liquefaction potential of the subsurface soils and the potential for seismically induced settlement will be evaluated. The geotechnical report will include recommendations to satisfy BART design criteria for seismic hazards, such as liquefaction and seismically induced settlement.

Section 6.3 of the BART design criteria indicates that the design of piles will take into consideration the effect of negative skin friction (downdrag) on the piles which may result from seismically induced settlement. The drilled caissons used to support the aerial structure west of Highway 101 would extend through any potentially liquefiable artificial fills and underlying Bay Mud and would be of sufficient depth to mitigate seismically induced settlement. In addition, please refer to Response 35.2 for a discussion of the resistance of BART's structures to collapse during an earthquake.

- 50.7. The impact of the new aerial wye alignment on my neighborhood is extreme. I live on Huntington Avenue in San Bruno between Cupid Row and San Felipe, just north of the San Bruno Water Department. By extrapolation, one can conclude that we would be impacted by noise, construction, traffic and all of the impacts associated with the traversing of the SFIA property by BART because of our close proximity to that parcel. The new wye alignment is the worst yet offered for our particular area, given the sound wall, removal of mature vegetation and noise impacts.

Response. Under the Aerial Design Option LPA, the BART alignment between Cupid Row and San Felipe Avenue would rise in retained cut and continue at grade just south of San Felipe Avenue. As a result of further refinement to the project, the sound wall described in Impacts 1 and 2 would be located between the CalTrain and BART alignments rather than along the western edge of CalTrain. The loss of trees described in Impact 2 would not occur as a result of the sound wall, because the wall would sit atop the crashwall which is already part of the project. To clarify this refinement, Impacts 1 and 2, on page 3.9-2 in the FRDEIR/S#2DEIS are replaced with the following single impact:

1. *Between a point approximately 400 feet north of San Felipe Avenue in San Bruno and approximately 300 feet north of Madrone Street in Millbrae, a sound wall would be located between the CalTrain and BART alignments. The sound wall would not alter the visual setting for Lomita Park residents, since it would lie east of CalTrain and would be partially screened by both CalTrain and the existing trees west of the tracks. (1)*

In order to reduce potential noise impacts to residents along Huntington and San Antonio Avenues, the Aerial Design Option LPA includes a sound wall located between the BART and CalTrain mainline rights-of-way. The sound wall would vary in height depending on potential noise impacts. The wall would not result in visual disturbance or obstruct significant views of the open space area at the SFIA west of Bayshore parcel. Views of this area are largely screened now by the eucalyptus trees, resulting in no net change in terms of views of the open space area.

The sound wall between the CalTrain and BART alignments would reduce noise impacts to residents along Huntington Avenue, including those between Cupid Row and San Felipe Avenue, to an insignificant level. Vibration impacts would be insignificant for residents along this portion of Huntington Avenue.

Construction impacts of the Aerial Design Option LPA are presented in Section 3.13, Construction, of the FRDEIR/S#2DEIS. The impacts of truck traffic would be insignificant with implementation of the following mitigations: designation of construction vehicle routes within the BART right-of-way, coordination of vehicle routes with local jurisdictions, additional traffic control, and temporary acceleration/deceleration lanes to/from Highway 101. The proximity to construction activities would be a significant, unavoidable visual impact.

The commentor's objection to the Aerial Design Option is noted. Public input regarding the merits of different alternatives was considered by the BART and SamTrans boards in selection of the Alternative VI Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Volume I of the FEIR/FEIS, which explains why BART is pursuing an aerial alignment into the SFIA.

51. IRWIN, JEROME

- 51.1. Can you clarify from your perspective what exactly is the current status of the San Francisco garter snake as regards the proposed extension? When was the last biological study conducted in the SFO area on the snake? What are the findings? Has it already been extirpated or in danger of becoming so?

Response. The San Francisco garter snake (SFGS) inhabits the entire 180 acres of the west of Bayshore parcel and has been found in the following seven general areas, as defined by Wharton (1988) and McGinnis and Larsen (1991): the seasonal wetlands at the southern end of the parcel; along and within the southern portions of South Lomita Canal; along and in San Felipe–South Lomita Canal; within the uplands between San Felipe–South Lomita Canal; the seasonal wetlands immediately west of Highway 101; in and along Cupid Row Canal; and south of San Bruno Avenue and north of Cupid Row Canal. The largest number of snakes were reported along and in South Lomita Canal, where aquatic habitats are available throughout the year. In the spring months, the seasonal wetlands immediately west of Highway 101 are typically full of water and attract the SFGS to these areas to feed. The San Felipe portion of the San Felipe–South Lomita Canal is used in the spring, when it is full of water, as a travel corridor between Cupid Row Canal and South Lomita Canal. Cupid Row Canal at one time provided good habitat for the SFGS, but has been altered by tidal influences and increased water salinities. Recent efforts to manage the tidal gates have resulted in improved habitat for the SFGS and its prey species.

Surveys conducted between May 1983 and October 1985 resulted in population estimates of 465 to 526 SFGS at the west of Bayshore parcel. Subsequent trapping surveys in 1990 and 1991 (McGinnis, 1992) concluded that the number of SFGS in the same area was significantly lower. These studies also showed that the SFGS population was concentrated in the South Lomita Canal and seasonal wetlands immediately west of Highway 101 during the spring months.

The reduction in population has been attributed in part to seven years of consecutive drought conditions at the time of the second study. Other contributing factors may include:

- The intrusion of saltwater in Cupid Row Canal, which altered aquatic habitats and eliminated vegetation cover and prey species for the SFGS;
- The introduction of non-native predator species (i.e., bullfrog) to the site that may have significantly reduced the principal food source (i.e., California red-legged frog) for the SFGS;
- Continued risk to SFGS from illegal collecting and vehicular traffic; and
- Ground-level entryways to underground culverts, into which individual SFGS enter and cannot escape.

The U.S. Fish and Wildlife Service (USFWS) has expressed concern regarding the health and sustainability of the SFGS population, if these conditions persist at the site.

BART proposed to conduct another SFGS trapping survey on the west of Bayshore parcel for the 1993 DEIR/DEIS, but the USFWS believed that such a survey was not necessary and would further impact the snake population.

- 51.2. Is the plan to herd up all the...S.F. garter snake[s] and move them all to a preserve?...If they're in hibernation this time of year how are they to be rounded up? Are the Red-Legged frogs, their food source, to be rounded up as well? Where are they to be transported to? Will the preserve include, as well, upland, grassy habitat for hibernation? Will there be a buffer zone of 300-400 yards around those habitats? If not, how much of a buffer zone? And if final transportation of the snake population isn't scheduled until after hibernation in March, will it adversely impact upon the June-July birthing cycle when the snake again migrates to its upland, grassy habitats?

Response. The mitigation measures for the SFGS do *not* include the capture of all the SFGS on the west of Bayshore parcel. The captive feeding program would only involve those SFGS caught while clearing construction areas. Details regarding mitigation measures for snake populations and habitats are presented in the Biological Assessment and Biological Opinion, presented in Volume V of the FEIR/FEIS.

52. JOHNSON, NEAL

- 52.1. I am very pleased with the compromise reached for the aerial airport station. I believe this will provide good patron service, while expending a reasonable amount for construction.

Response. The commentor's support for the Alternative VI Aerial Design Option is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

- 52.2. The drawings showing the tracks and switches leading to the airport station appear to have a bottleneck in the center track....It uses only the easternmost switches for normal revenue service. There are no potential switching conflicts and the only restraint to headways would be the train reversal time. I feel that designing this stub for minimum headways and maximum operational throughput (rather than flexibility) is most important.

Response. Figure 3 (in the Design Appendix) shows a three-track/two-platform terminal layout for Design Option "X," which provides for minimum headways and maximum flexibility for failure management. Any one of the three tracks could be taken out of service to store a failed train, without impacting service and headways on either the north or south branch of the wye.

- 53.1. Page 1-4, BART Board Action, "At least 50 percent of passengers arriving on BART should be able to reach the first ticket counter at their selected airline terminal location from the midpoint of the BART platform within a four to five minute walk without transfer." That would not be true were more than half the passengers on a given train bound for airlines other than United or United Shuttle. Nor would it be true even to United for those with under-seat luggage and other carry-on items, e.g., camera and garment bags. It would certainly be more than a five-minute walk to the South and Central Terminals and the eastern half of the North Terminal, and longer still if sidewalks were the obstacle course they often are. Transfer to Airport Light Rail would take even more time, given its distance from departure level.

Response. For planning purposes, BART has chosen a Passenger Service Level Standard of a four- to five-minute walk to the nearest ticket counter of a passenger's selected airline for 50 percent of the passengers. Since United Airlines is the dominant carrier at the SFIA and accounts for over half the traffic at the airport, and international flights account for over 16 percent of the traffic, it is assumed that, on average, over 50 percent of the passengers could walk to their airline ticket counters. Access to the Airport Light Rail System (ALRS) is only one level above BART and would reduce travel times to destinations other than the North Terminal and the International Terminal. Baggage check-in facilities are provided at either end of the BART platforms.

- 53.2. Page 1-5, re trainside baggage handling. The irony is that BART is not the transportation mode of choice for anyone with travel luggage -- trains lack space or facilities to accommodate it.

Response. The commentor is correct that BART cars do not have overhead racks or designated areas for baggage storage. However, the vast majority of air passenger trips to the airport would not occur during the commuter peak period, so there should be ample floor and seat space for air passenger luggage.

- 53.3. Option X provides minimal facility level changes, because the station platform is one floor above the departure level in the planned International Terminal." The statement is incorrect. The point of Option X and its newer, extended version is to have BART on the terminal's departure level, not one floor above.

Response. The commentor is correct that the BART platforms would be located on the same level as the departures level of the International Terminal, as stated on page 2-13 of the FRDEIR/S#2DEIS. Any statements otherwise are incorrect.

- 53.4. Page 2-9, City of Burlingame. "...turnback/tailtracks in Burlingame would be within the CalTrain right-of-way..." What once was to be a single tailtrack has grown to four. The report, which later notes a need to negotiate for use of the existing rail right-of-way, does not acknowledge that its owner, the Joint Powers Board, cannot jeopardize CalTrain operation and the impending arrival of high-speed, intercity trains.

Response. The tailtrack under Alternative VI in the City of Burlingame consists of three tracks, as shown in Figure 10, Alternative VI, on page 84 of the Design Appendix. The revised tailtrack of the Aerial Design Option, shown in Figures 6 and 7 in the FRDEIR/S#2DEIS, includes a fourth track to facilitate a cross-platform transfer between BART and CalTrain. This feature improves CalTrain service from the south, while not impeding the current or future use of the Peninsula Corridor Joint Powers Board tracks.

- 53.5. Page 3.1-3, Table 3.1-1, Alternative VI Aerial Design Option, Transit Travel Times. Kaiser Medical Center should not be shown as a southbound destination when it's not shown as a northbound boarding

point. BART would in fact bypass our largest regional medical center, requiring patients to transfer to SamTrans at the Hickey Station.

Response. The travel time table referred to by the commentor, Table 3.1-1 in the FRDEIR/S#2DEIS, includes destinations that are not BART stations, but rather selected travel destinations. The origins provided in this table are major transit boarding points because the initial origin points, such as individual residences, are too numerous to include. The travel times listed include the travel time on the transit vehicle plus average wait time for service during the A.M. peak hour, and access time from a transit vehicle to the final destination. Generally, the travel times can be read in the reverse direction, such as from Kaiser Medical Center to the 12th Street BART Station in Oakland, except that the wait time for transit vehicles may differ slightly in the reverse direction. Transit providers often provide more service in the peak direction during the peak period than is provided in the off-peak direction during the same period.

- 53.6. Page 3.1-9. "4...The BART alignment into the SFIA would create a transfer opportunity between BART and the ALRS at the Airport International Terminal Station." Transfer would not be at the station under Option X or its favored extension. ALRS is to be one level above. From ALRS, transferees would have to descend one level, walk over a pedestrian bridge, descend another level, and carry bags some distance to their airline ticket counters. That's not a very attractive "opportunity."

Response. Under the Aerial Design Option LPA, transfers between BART and the ALRS at the International Terminal Station would be straightforward. The ALRS Ground Transportation Center/Rental Car Garage Station would be one level above the BART station. Easy access to the ALRS, one level above the BART station, would be provided via escalator or elevator. BART baggage check-in would be provided at the east end of the BART platform. The commentor is describing transfers between BART and the ALRS under the aerial wye-stub Option B.

- 53.7. Page 3.1-13, Millbrae Avenue-Highway 101 Interchange, Mitigation Measures. "Northbound vehicles accessing the...BART station would be required to use the diagonal off-ramp and turn left at new traffic signal." Peak-hour backup from that signal, with little room for stacking, could create freeway havoc. No mitigation is proposed.

Response. The northbound diagonal off-ramp would be designed to accommodate potential queues and keep vehicles from backing up into the collector-distributor road that serves the Millbrae Avenue northbound ramps.

The design of the proposed Partial Clover interchange would provide sufficient storage room that the queue of vehicles waiting for the traffic signal would not back up onto the northbound Highway 101 lanes. Furthermore, Caltrans requires that off-ramps include traffic detectors placed in the ramp pavement at the end of the storage space, and that the traffic signal be configured such that traffic on the off-ramp receive extra green time, as needed, to ensure that the traffic queue never backs onto the freeway.

- 53.8. Page 3.1-16, Parking Meters or Restricted Parking Zones. It's said much meters or zones "would encourage turnover and make curb parking available to patrons of local businesses." Plainly, they would also have a dampening effect on clients and callers whose business parking requirements could easily exceed the limits imposed.

Response. Please refer to Responses 6.26 and 6.27 for a discussion of monitoring spillover parking and the various programs designed to reduce spillover parking. Use of parking meters or restricted times for parking would only be implemented if spillover parking were a problem, and mitigation measures would only be implemented after consultation with local representatives to determine the most acceptable measures for affected households and businesses. The measures would be directed at discouraging commuter parking and not at discouraging parking by shoppers in commercial areas.

- 53.9. Pedestrian Impact. "There would, however, be a significant reduction in pedestrian volumes at the Airport International Terminal Station under the Aerial Design Option..." "1. Under the Alternative VI Aerial Design Option (either Option B or X), pedestrian volumes would increase around the new Airport International Terminal..." Sounds like a contradiction. Which would it be -- reduction or increase?

Response. Please refer to Response 12.9 for a discussion of language in the FRDEIR/S#2DEIS concerning pedestrian impacts.

- 53.10. Page 3.3-1, 2 "...a landscaped soundwall proposed as part of the Aerial Design Option...would not obstruct significant views or detract from scenic resources." The statement is outrageously at odds with the visual constraints of putting a masonry wall where we now have a delightful greenbelt. Nor does this section acknowledge that 1) such wall's acoustical values are dubious from practical experience and 2) a wall would impede emergency access to the CalTrain right-of-way and to a BART aerial structure.

Response. The view of the open space from Huntington and San Antonio Avenues is screened by trees, and only occasional views are available. The sound wall would be designed to reduce noise to acceptable levels. Please refer to Section 3.9 for details on noise levels. Emergency access to CalTrain would remain unobstructed from the east. Please also refer to Response 50.7 for further details on the sound wall.

- 53.11. Page 3.51, Community Services and Facilities. "The Plan stipulates that local fire department services shall be requested to respond during passenger emergency evacuation of BART trains." Does the BART Emergency Plan (1994) state the BART would meet the additional cost of equipment and training required for such response?

Response. Please refer to Response 8.17 for a discussion of cost responsibility.

- 53.12. Page 3.7-2, Drainage Ditches. There is no mention of alternative disposal of stormwater if ditches are filled in for a soundwall.

Response. Please refer to Response 12.11 for a discussion of stormwater drainage mitigation.

- 53.13. Page 3.7-5, 2.2, Habitat Restoration Plan. "The HRP proposed five shallow ponds...each with a static water level maintained by a potable water source." Whose potable water from where and under what authority in an era of water conservation?

Response. The Habitat Restoration Plan option is no longer under consideration, and thus the source of potable water is no longer an issue.

- 53.14. Page 3.9-1, Noise and Vibration. "Vibration impacts would not occur at the proposed International Terminal...because the alignment would be in aerial, not subway, configuration." Untrue, because BART's tracks and station would be structurally part of the terminal.

Response. The International Terminal and BART airport station will be structurally separated. A coordinated design that isolates vibrations between the two buildings would be reviewed by the airport's consultant. Please refer to Response 12.23 for a discussion of the potential for BART-induced noise and vibration in the proposed International Terminal.

- 53.15. Page 3.10-1, Air Quality. This section does not acknowledge increased pollution from cold-start, slow-moving, local traffic generated by BART, a point covered in my oral remarks at the 11/16/95 hearing.

Response. The effects of vehicle speed and the thermal operating state are incorporated into the analysis of local carbon monoxide (CO) impacts. All methodologies and assumptions employed in the analysis of local CO impacts are described in detail in the Air Quality Technical Report.

Local CO analyses of individual roadway intersections were performed with either the California Line Source Dispersion Model (CALINE4) or the EPA-recommended CAL3QHC dispersion model. CALINE4 uses modal emission factors, which account for the variation in vehicle emissions during the cruise, deceleration, idle, and acceleration modes of vehicle operation at an intersection. CAL3QHC contains a queuing algorithm which calculates the number of vehicles stopped at each intersection approach and assigns the appropriate idling emission factor to that portion of the roadway. Therefore, the local CO analysis of roadway intersections accounts for the relatively high CO emission rates (mass per time) of slow-moving and idling vehicles.

Consistent with Bay Area Air Quality Management District guidance, the percentages of on-road vehicles in cold-start transient and hot-start transient operating modes are assumed to be 20.6 percent and 27.3 percent, respectively. One-hundred percent of vehicles exiting BART parking facilities are assumed to be in cold-start transient mode.

Please refer to DEIR/SDEIS Responses 17.129 and 20.105 for discussions of related aspects of the local CO analysis.

- 53.16. xal-4AxPage 3.11-1, Public Health and Safety. This section fails to address the risk of accident, injury, and death associated with operation of BART at grade and atop an elevated structure under Alternative VI Aerial Design Option.

Response. The safety of the BART system is regulated by the California Public Utilities Commission. The risk of accident, injury, and death due to operation of trains on either at-grade or aerial tracks is reduced by incorporating the requirements of the life safety codes into the design of the facilities. The requirements include emergency walkways on the aerial structure; in addition, at-grade BART facilities are fenced off from public access. The BART Emergency Plan (1994) and Train Operators Manual (1983) identify procedures for emergency evacuation of passengers from aerial structures. These procedures include turning off third rail power and evacuating passengers via the walkway on the aerial structure.

- 53.17. Page 4-1, Short-Term Effects. How could the soundwall's visual effects be labeled short-term?

Response. The short-term visual effect described on page 4-1 refers to the construction period. The long-term visual effects of the sound wall were determined to be insignificant and are described on page 3.3-2 of the FRDEIR/S#2DEIS under Impact 3.

- 53.18. Page 4-3, Selection and Adoption of Appropriate Mitigation Measures. "Mitigation measures have been developed to reduce and/or eliminate significant impacts in all areas of the environmental analysis." The statement is untrue if we are to believe that "...any direct or indirect impact [from BART] could result in the extirpation of the population" of the San Francisco garter snake in the airport wetlands (Page 3.13-31).

Response. The comment that "any direct or indirect impact could result in the extirpation of the San Francisco garter snake" is correct. However, this comment refers to unmitigated impacts. Mitigation measures approved by the resource agencies are designed to reduce impacts to below a level of significance, and thus help preserve the extant snake population.

- 53.19. [The sound wall] would also serve to channel heavier-than-air automotive emissions, impeding dispersal.

Response. The proposed sound wall along the western edge of the CalTrain right-of-way would not cause any significant increase in airborne concentrations of vehicular pollutants at San Antonio Avenue. First, the 11 roadway intersections at the east side of the sound wall (the intersections of San Antonio Avenue with San Felipe, San Luis, San Marco, Santa Dominga, Santa Lucia, San Benito, Santa Inez, Santa Clara, San Diego, Santa Maria, and Santa Helena Avenues) have relatively low traffic volumes and relatively good levels of service. Therefore, the airborne concentrations of vehicular pollutants in the vicinity of these 11 intersections would be relatively low. Thus, none of these intersections were selected for local CO analysis. Second, the proposed sound wall is at least 75 feet away from each of these intersections (as measured from the eastern edge of San Antonio Avenue at the center line of the cross street). At this distance, the sound wall would have a negligible effect on the dispersion of vehicular emissions in the immediate vicinity of the roadway (in the local CO analysis, concentrations were calculated at a distance of 15 feet from the edge of the roadway).

- 53.20. The report must take into account the lowering of property values from both the wall's visual pollution and from reflecting and intensifying traffic noise along adjoining streets.

Response. While the proposed wall may be visually undesirable to the commentor compared to the current environment, it would reduce the noise impacts of existing rail service and proposed BART trains. Many factors help determine the property value of a particular parcel, including both the visual and noise environments. Thus, an improvement in one environmental condition may offset a perceived deterioration in another. In addition, the improved regional access provided by BART should have a small positive impact on property values. Please refer to Response 50.4 for a discussion of construction techniques that would result in aesthetically pleasing sound walls.

- 53.21. The same neighbors bordering that monstrous soundwall would have no benefit from BART as transit. Not without getting out of the car and driving to Millbrae or Tanforan -- the very thing transit is supposed to replace. For downtown San Bruno, the problem is worse. Businesses there have a large and growing regional clientele who could benefit from regional transit. But BART would bypass downtown San Bruno, underground.

Response. In addition to driving to a BART-San Francisco Airport Extension station, these individuals can use SamTrans bus service to access one of the stations. The CalTrain San Bruno Station will remain in its current location on Huntington Avenue after construction of the BART extension is completed. This CalTrain station is within walking distance of residences near the sound wall. In addition, the sound wall would mitigate noise impacts from CalTrain trains as well as from BART trains. The Alternative VI LPA with the Tanforan Station was recommended by the San Bruno City Council to the BART and SamTrans Boards of Directors. The Aerial Design Option LPA also proposes to locate the San Bruno BART Station adjacent to the Tanforan Park Shopping Center. The alternatives with BART stations in downtown San Bruno were not favored by the majority of elected representatives from the City of San Bruno.

54. KNUDSEN, BOB & GRETEL

- 54.1. I believe there is only one way to go, the right way, the BART way right into the airport direct from San Francisco.

Response. The commentor's support for the BART-San Francisco Airport Extension is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

- 55.1 I do not feel BART will mitigate traffic problems for San Bruno, Millbrae, 101, 380, 280 and Skyline Blvd. I can see no relief especially for traffic flowing south to north. The airport remodeling is further adding to traffic.

Response. The subarea traffic model projects that the north-south traffic under Alternative VI and the Aerial Design Option LPA would be lower on the sections of Highway 101, I-280, and Skyline Boulevard that are north of the Millbrae Avenue Station as compared to the No Build Alternative. Please refer to Response 7.6 for a discussion of traffic impacts relating to I-280. Please refer to Response 18.8 for a discussion of the cumulative analysis of the SFIA Master Plan and the BART extension. Traffic impacts were also analyzed in the City of San Bruno, with mitigation measures presented for every significant impact to an intersection in that city. For example, the traffic impact and mitigation measure to the El Camino Real/Sneath intersection are included on page 3.1-160 of the DEIR/Technical Appendix. Please also refer to Response 8.43 for a discussion of traffic impacts to San Bruno Avenue under the Aerial Design Option LPA.

- 55.2 Upgrading CalTrain would be less costly and would help traffic flow in both directions-north and south. You could still connect to the airport.

Response. The commentor's support for upgrading the existing CalTrain system is noted. Please refer to Response 22.1 of this FEIR/FEIS for a discussion of the proposed alternatives and upgrades to CalTrain considered in the *CalTrain San Francisco Downtown Extension/System Upgrades Final Report*, March 1994.

A comparison of cost effectiveness for CalTrain upgrades, including the extension to downtown San Francisco and the BART extensions, was performed by the Metropolitan Transportation Commission (MTC) in the 1990 Phase 1 BART San Francisco Airport Extension/CalTrain Upgrade Pre-Alternatives Analysis/DEIS study. MTC estimated that the Federal Transit Administration (FTA) cost-effectiveness new rider index was above \$25 for the CalTrain upgrade-electrified and between \$20 and \$25 for the CalTrain upgrade-diesel. By comparison, MTC estimated the BART Airport External Alternative Urban Mass Transportation Administration (UMTA) cost-effectiveness rider index between \$15 and \$20 for BART Internal.

- 55.3 I worry about safety around [the] BART station and deterioration of the station and surrounding area, Daly City is an example of unsafe conditions, dirtiness, and smell! The staff is not too friendly or helpful there. Parking is a problem Mon-Fri.

Response. Existing BART stations require improvements over time based upon increased use, operating requirements, and new regulations. BART is presently implementing a program to upgrade existing stations, as needed, to address operating requirements and regulations/requirements not in effect when stations were built (e.g., handicap access). The new BART stations will be designed with consideration for public safety and aesthetics. Maintenance of stations and parking areas with the intention of keeping public areas clean and orderly is the responsibility of BART. BART police concentrate on controlling crime within the BART system and making the system safe for passengers.

BART's policy is to provide sufficient off-street parking to meet the projected passenger access demand at all new stations. Mitigation Measure 13, i.e. residential permit parking, presented on page 3.1-28 of the DEIR/SDEIS, establishes a monitoring program to determine when substantial spillover parking occurs. If spillover parking causes parking shortages on local streets, then a residential permit parking program could be implemented. These programs have been used successfully around BART stations and other activity centers in the Bay Area.

- 55.4. I feel not enough study has been given to traffic problems in the Bay Area now and in the future. Monies saved could be used to improve and widen the roads we have, i.e., portion of Skyline Blvd. between Sneath Lane and San Bruno Avenue!

Response. Traffic impacts were thoroughly studied in all environmental documents relating to the proposed BART extension. The DEIR/SDEIS presented the traffic impacts to Highway 101, from Airport Boulevard to Third Avenue, as well as to 97 intersections. The analysis covered the years 1993 (base year), 1998 (year of opening), and 2010. Federal funds would be allocated by FTA and could not be reallocated for individual roadway improvements, unless these improvements specifically mitigated significant impacts resulting from a federally funded transit project.

56. LOCKEY, BRUCE

- 56.1. My first choice was for an underground terminal for BART at SFO but that seems to [be] out of contention so I would support Option "B" as a second choice.

Response. The commentator's support for the Alternative VI Locally Preferred Alternative (LPA) and for the Alternative VI Aerial Design Option LPA, Option B, as a second choice, is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

- 56.2. [I] fail to see how it could cost as much to build this SFO extension as the whole system cost originally.

Response. The original BART system was constructed between 1964 and 1973. A number of factors have since increased construction costs, including inflation and an increase in the cost of labor and materials at a compound rate each year. Please refer to Response 6.75 for further discussion of this topic.

57. MANGOLD, SANDRA E.

- 57.1. I strongly support an upgrade of the CalTrain system.

Response. The commentator's support for upgrading the existing CalTrain system is noted. Please refer to Response 10.3 of this FEIR/FEIS for a discussion of how selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) does not preclude future CalTrain improvements. Please also refer to Response 22.1 of this FEIR/FEIS for a discussion of the proposed alternatives and upgrades to CalTrain considered in the *CalTrain San Francisco Downtown Extension/System Upgrades Final Report*, March 1994. In addition, please refer to Response 6.8 for a discussion of the study of the CalTrain extension to downtown San Francisco.

- 57.2. The [1995 San Mateo County Grand Jury] report blasts two voter approved measures in 1987 (Measure K) and in 1992 (Measure B) that supported a BART extension because cost benefit analysis and service impacts to SamTrans' other responsibilities were not given or mentioned. "Thus, voters were not adequately informed to be able to make a reasonable judgment." Measure C supported a CalTrain extension and won greater support than Measure B, yet SamTrans still proceeded with its SFO BART extension commitment stating "approval of the voters." The report also questions the relationships between and memberships of the public agencies that should be operating in the best interest of the residents of San Mateo County.

Response. The commentator poses BART and CalTrain as competitive in San Mateo County, which assumes that the BART-San Francisco Airport Extension would undermine the CalTrain system. In fact, the two systems are complementary; both are needed to meet forecasted future demand, and the

best service to San Mateo residents would be available from a BART–San Francisco Airport Extension in conjunction with existing CalTrain service.

Ballot measures are rarely sufficiently detailed to provide accurate information regarding cost/benefit analyses and service impacts to public agencies. Neither the voter information provided on Measure B (proposal to study the extension of BART into San Mateo County) nor on Measure C (proposal to study extension of CalTrain to downtown San Francisco) covered cost/benefit trade-offs or service impacts to SamTrans.

SamTrans has contributed far more dollars to CalTrain service than to BART service, and is firmly committed to maintaining the CalTrain system. Furthermore, a CalTrain extension was reviewed in the screening process for the Alternatives Analysis for this corridor. The Alternatives Analysis was completed by Metropolitan Transportation Commission (MTC) in 1992. The MTC Policy Committee, which includes SamTrans as a member, determined that the CalTrain extension was already being sufficiently reviewed in another study, and thus was not a necessary inclusion in the BART extension study.

- 57.3. The Grand Jury recommend[s] that the participating agencies concentrate on achieving a regional rail system utilizing CalTrain as the Peninsula corridor leg of the system...connecting it with SFO Light Rail System and extending it into downtown San Francisco.

Response. Please refer to Response 32.72 for a discussion of the grand jury recommendation. Please also refer to Response 13.4 for a discussion of the proposed CalTrain connection to the Airport Light Rail System.

- 57.4. The Grand Jury recommend[s] that they investigate the feasibility of activating CalTrain service on the Dumbarton Bridge Rail Spur...for an East Bay connection.

Response. Please refer to Response 32.74 for a discussion of the Dumbarton Rail spur.

- 57.5. The Grand Jury recommend[s] that the San Mateo County Board of Supervisors and SamTrans withdraw immediately from the BART/SamTrans agreement to extend BART to SFO or any further into San Mateo County.

Response. The grand jury report recommends that the San Mateo County Board of Supervisors withdraw from the BART-SamTrans Comprehensive Agreement. The Board of Supervisors is not a party to the BART-SamTrans agreement and cannot withdraw from an agreement that it has not signed. The SamTrans Board has consistently supported the San Francisco Airport Extension, by signing the BART-SamTrans Comprehensive Agreement, voting for the Aerial Design Option to Alternative VI as the LPA, and by committing funds to the project.

- 57.6. The Grand Jury recommend[s] that the 1996 Grand Jury continue the analysis of the transportation agencies that affect San Mateo County transportation with the purpose of reducing cost and enhancing service

Response. SamTrans, BART, MTC, and the Federal Transit Administration (FTA) are all committed to the goals of enhancing transit services at a reasonable cost. The grand jury is an independent group and may continue to study transportation agencies in San Mateo County at its discretion.

- 57.7. I urge the federal government and the citizens of San Mateo County to reject the enormously expensive and highly destructive BART-Airport Extension and stop the hemorrhage of public dollars that have already been squandered on this project.

Response. The commentor's opposition to the BART–San Francisco Airport Extension is noted. Please refer to Section 1.3 of the DEIR/SDEIS for a discussion of the need for the project, and Response 23.2 of this FEIR/FEIS for a discussion of the studies demonstrating the need for a rail transit project south of Colma.

58. MICHEL, ARTHUR H.

- 58.1. How would the Y track configuration work operationally? If trains are to operate to both SFO and the Millbrae Ave. BART/CalTrain station will this not result in degraded service to both locations?

Response. BART's track arrangement is designed to provide maximum flexibility in train operations in order to service patrons in high-demand areas with little difficulty. BART will decide, based on ridership surveys, how best to route its trains to provide convenient travel to BART patrons. The conceptual operating plan and service patterns for the Aerial Design Option LPA are described in Section 2.2, Route Description and Alignment, of the FRDEIR/S#2DEIS.

However, the Aerial Design Option LPA provides the highest overall level of passenger convenience for airport-bound patrons. The Aerial Design Option LPA incorporates Passenger Service Quality Standards, adopted by the BART Board of Directors on September 12, 1995 and by the San Francisco International Airports Commission on September 19, 1995, and is the only alternative under study in the DEIR/SDEIS that would satisfy all of these service quality standards.

Of all the BART build alternatives, the Aerial Design Option LPA would provide the shortest walking distance to the new International Terminal and to the North Terminal (United Airlines).

The location of the recommended BART airport station would be in front of the west wall at the departure level of the International Terminal. At least 50 percent of passengers arriving on BART could reach the first ticket counter at their selected airline from the midpoint of the BART platform with a four- to five-minute walk. Moving sidewalks, additional elevators, and escalators would be added to the International Terminal to facilitate convenient passenger access to the North (United Airlines) Terminal. In addition, baggage check-in would be provided at the east end of the BART platform, as well as easy access to the Airport Light Rail System (ALRS), one level above the BART station, via escalator or elevator. Appropriate architectural treatment, fully-integrated graphics, and signage would be incorporated, during the final design phase, to provide a user-friendly atmosphere.

- 58.2. I suggest that consideration be given to locating the BART/CalTrain station at San Bruno and operating all trains directly into SFO. This would make the Y configuration unnecessary for purposes of the presently planned airport extension.

Response. Please refer to Response 36.5 for a discussion of a spur line into and out of the airport.

The south leg of the wye into the SFIA is essential for patron connection to CalTrain and is needed for operations and airport security purposes.

The Aerial Design Option LPA provides north and south legs, each with two tracks, transitioning off the mainline in an aerial guideway into a three-track, two-platform station directly in front of the west face of the International Terminal. This design option optimizes passenger convenience relative to capital costs.

The current design optimizes train movements into and out of the airport station from San Francisco, and out of the station to Millbrae. No reverse moves would be required under normal operations or in the case of a malfunctioning train. In addition, the full wye provides for trains from San Francisco to Millbrae, via the airport station, during low-demand periods such as non-rush hours, late nights, and weekends.

The south leg is absolutely essential to the overall operation of the BART extension into the airport. Virtually every aspect of service, including passenger convenience and rail operations, would be compromised without the south leg.

An essential feature of the BART–San Francisco Airport Extension will be the opportunity to screen BART passengers and baggage, before they enter the airport terminal, during periods of heightened security. This provision is included in an Assessment of Security Requirements for BART airport facilities that will be signed by BART, SFIA, and Federal Aviation Administration.

- 58.3. Would it not be more convenient for passengers transferring from BART to and from the Airport Light Rail System if the stations were designed to allow across platform transfers rather than multilevel transfer involving stairways or escalators?

Response. Extensive studies were undertaken with regard to providing cross-platform transfers between BART and the ALRS at the Airport Station. The studies identified the following technical difficulties that could not be overcome without severely impacting the Airport Master Plan projects and implementation schedule: physical limitations within airport property, especially as related to airside operations; alignment and profile conflicts between BART and ALRS tracks west of the station area; and operational complexities regarding which ALRS platform would serve as a terminal versus a remote maintenance area. In addition, the Aerial Design Option LPA offers a convenient transfer between BART and the ALRS via a one-level escalator ride between the two stations.

- 58.4. Does not Option X have most of the disadvantages of the plan to place the multimodal station east of Highway 101? Most passengers using domestic airline service would still need to transfer from BART to the Airport Light Rail System in order to reach their gates. Option B is somewhat better because it would make it easier for United Airlines domestic passengers to walk to their gates. Even this location is less than ideal because it is still inconvenient for passengers using other domestic carriers.

Response. The Aerial Design Option LPA accommodates BART's Passenger Service Quality Standard that 50 percent of the rail patrons have a four- to five-minute walk from the midpoint of the BART platform to the first ticket counter at their selected airline terminal location without a transfer. A station location west of Highway 101 requires 100 percent of airport-bound rail patrons to transfer to the ALRS, requiring travel times over four to five minutes to access any airline ticket counter within the terminal area.

- 58.5. One way to improve access to the gates of other domestic airlines would be to locate a second BART station between the south and central terminals. Even if it is not feasible to finance such a second station in the initial stage at least inclusion of this concept in the master plan would provide recognition that such a second station would be desirable. If it is not possible to plan BART access into the terminal area in such a way that most passengers will be able to conveniently walk to their airline gates then I believe that the whole concept is faulted.

Response. BART and the SFIA have been coordinating the location of the proposed BART station at the western face of the new International Terminal for months. Extending the alignment from a station at the new International Terminal to a second station between the central and south terminals would require reconstruction of those existing terminals. A second airport station by the south and central terminals would require significant revision to the existing airport terminal design and functions. It would also affect future terminal expansion. For these reasons, a second BART station is financially infeasible, both now and in the foreseeable future.

As described in Chapter 1 of the FRDEIR/S#2DEIS, on July 25, 1995, the Airports Commission resolved that, "the location for an Airport BART Station shall be in front of the new International Terminal, under the Airport's Light Rail System so that the platform for BART trains is at the same

floor elevation as the departure lobby of the new International Terminal, with the eastern end of the BART Station abutting the western face of the new International Terminal..."

Please refer to Response 58.1 for a discussion of Passenger Service Quality Standards.

- 58.6. In this case I would prefer to revisit the concept of combined BART/CalTrain/Airport Light Rail multimodal center west of Highway 101. That concept at least has the potential for a rational integration of all rail modes and would be less costly to build. The key to making the latter concept work would be a fast, convenient and efficient internal light rail system with easy transfers between the various modes and adequate accommodation for baggage handling.

Response. The 1992 LPA and Alternative III (Base Case) provide an intermodal connection between BART, CalTrain, and the ALRS west of Highway 101. Based on the environmental information in the DEIR/SDEIS and on a preliminary evaluation of comments received on April 27 and April 28, 1995, the BART and SamTrans Boards of Directors selected Alternative VI as the new LPA for advancement to further preliminary engineering and environmental evaluation. Alternative VI is the only build alternative which does not have a direct BART/ALRS or CalTrain/ALRS connection. From the north, Alternative VI BART patrons would directly access the proposed Airport International Terminal. From the south, CalTrain patrons would transfer to BART at the Millbrae BART/CalTrain Station to access the proposed International Terminal. For further discussion of the reasons Alternative VI was selected, please refer to Chapter 1 of the FRDEIR/S#2DEIS.

- 58.7. The present options, including the Y configuration for BART tracks, the awkward connection with CalTrain and the inconvenient access to most domestic airlines make it difficult for me to support the aerial design option as presently conceived.

Response. The commentor's opposition to the Alternative VI Aerial Design Option is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

59. MILLBRAE SERRA CONVALESCENT HOSPITAL

- 59.1. It appears that the Railroad Avenue frontage between the existing CalTrain (Southern Pacific) right-of-way and the road access frontage of my lots 1-10 of Block 6 of Millbrae Villa Tract along Railroad Avenue are to become part of the "LIMITS OF PERMANENT RIGHT-OF-WAY REQUIRED." This roadway is not owned by the Southern Pacific (CalTrain), the City and County of San Francisco, or Peninsula Corridor Joint Powers Board. I am the owner.

Response. The commentor may be correct regarding the ownership of the parcels identified in Figure 1 of the Design Appendix to the FRDEIR/S#2DEIS. As stated on page 3.2-56 of the Technical Appendix, the acquisition and relocation information contained in the DEIR/SDEIS was based on existing written information supplemented by fieldwork and interviews of city staffs. Given the number of alternatives and the early stage of analysis, the approach taken was to identify the general impacts of each of the alignments on properties in any given area. Research regarding current owners of record was not conducted at this early stage.

The Design Appendix, Volume IV, Figure 15, of the FEIR/FEIS presents BART impacts to adjacent property west of CalTrain, north of Millbrae Avenue. The commentor will note that these revised drawings show less property in the area being permanently acquired than does the FRDEIR/S#2DEIS.

After adoption of the project by the BART and SamTrans boards, SamTrans will conduct research regarding the owners of record and will notify those owners of intent to acquire. Thereafter, property owners will be notified of intent to appraise. A fair market appraisal will be conducted by an

independent appraiser, and a fair market offer of just compensation will be made to the property owner.

- 59.2 It appears that lots 1 through 4 and 17 through 20 of Block 6 of the Millbrae (sic) Villa Tract are also to be acquired as they are shown within the segmented lines along the northerly line of Linden Avenue, easterly line of Serra Avenue, and westerly line of Railroad Avenue as within "Limits of Permanent Right-of-way Required (R/W)". I was contacted today by a Mr. Fred Arnold of BART Real Estate in response to my two calls to you last week. He advised me that this segmented line surrounding the lots was an error in printing. He said these parcels are not to be acquired. He confirmed that there has never been any intention by BART to acquire property west of the existing Southern Pacific (CalTrain) right-of-way. However, he advised me to write to you today as it is the last day to respond to the Draft Environmental Impact Statement.

Response. Please refer to Response 59.1 for a discussion of BART's property requirements. The revised Millbrae station plan requires property west of CalTrain.

- 59.3 You should also note that none of the other drawings referenced in the report as showing the proposed Millbrae Station (See Figures 2-11 and 2-12) suggest that all or any part of my property is to be acquired i.e., either the Railroad Avenue right-of-way or the lots in Block 6. Also, none of the written material I have read anywhere has suggested that BART intends to extend its acquisitions westerly of the existing Southern Pacific (CalTrain) right-of-way to all or any part of my property.

Response. Please refer to Response 59.1 for a discussion of BART's property requirements.

- 59.4 If the Millbrae Station is moved north and the acquisitions are to move westerly of the existing Southern Pacific (CalTrain) right-of-way, the above referenced Draft Environmental Impact Report is deficient as there is no mention of the land use, noise, vibration and/or air quality impacts that will affect my 125 residents, 115 employees, business, and/or real property value. This is true because of the described proposed project alignment during its construction and operation and/or because of the apparent designated acquisition of these two parts of my property are not acknowledged.

Response. The current Millbrae Station Site Plan does not require any additional right-of-way beyond that identified in the DEIR/Technical Appendix. Therefore, no further impacts have been identified for the Millbrae Serra Convalescent Hospital property.

Access to Millbrae Serra Convalescent Hospital will be maintained. The westerly portion of Railroad Avenue will remain accessible to emergency vehicles and during construction. Please refer to Response 59.1 for a discussion of the project's impacts to adjacent property.

- 59.5 Please note that Railroad Avenue and lots 1-4 and 17-20 are currently used for daily deliveries, refuse collection, fire and police access to the facility, and employee and visitor parking among other uses. Lots 1-4 and 17-20 are to provide a planned expansion of the existing facility, an assisted living complex and/or another higher use following the completion of the Millbrae Avenue Overpass and the direct access under the overpass to California Drive.

Response. Please refer to Responses 59.1 and 59.4 for a discussion of BART's property requirements and impacts to adjacent property.

- 59.6 The lack of accurate information in the report, a tardy response to my calls from you, and Mr. Arnold's incomplete answers to my questions have not permitted me to properly examine, much less understand, every impact that this possible new approach will have on my interests. I would appreciate further clarification as soon as possible.

Response. Please refer to Response 22.12 for a summary of the environmental review process.

- 60.1. I am writing to comment on the BART/SFO FRDEIR/S#2DEIS. I am disturbed by this plan -- it seems to incorporate the worst elements of option VI while dispensing with the benefits.

Response. The commentor's opposition to the Aerial Design Option LPA is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

- 60.2. A five minute walk, with baggage, is hardly a stellar level of service. Half the passengers will walk even longer. This factor will weigh heavily in individual decisions to use or not use BART for airport travel.

Response. The Passenger Service Quality Standards adopted by the San Francisco Airports Commission meet or exceed specifications for the world's best transit-airport connections. The five-minute walking time access from the midpoint of a transit platform to an airline ticketing counter is considered excellent service for international airports. Luggage facilities to check bags adjacent to the BART station would be available to give BART patrons the choice of walking to their terminal without luggage. Such luggage facilities would function in a manner similar to that of curbside luggage checking at the departure level of the airport. Please refer to Response 32.5 for further discussion of these issues.

- 60.3. For the next 10-20 years, the only south bay connection to the airport will be CalTrain. BART seems determined to make this connection inconvenient. I feel the regional "passenger service quality standards" should count the 50% of airport trips that start south of the airport.

Response. The Passenger Service Quality Standards apply to all trips to the SFIA, from both the north and the south. The CalTrain connection to the airport is designed to be as convenient as possible under each BART build alternative. According to Table 3.1-1 of the DEIR/Technical Appendix, SFIA Airline Passenger and Employee Origins, 65.1 percent of resident airline passengers and 40.4 percent of employees originate their trips from north of the airport. According to Appendix Table B-5, Alternative I Daily Person Trips to the SFIA, 33.4 percent of all trips to the airport are work trips. Therefore, approximately 56.9 percent of all trips to the airport originate from north of the airport. Please refer to Response 4.9 for further discussion of connectivity between CalTrain and the SFIA.

- 60.4. Even when BART eventually extends south to cover current CalTrain territory, the new plans will restrict usability. Plans X and B provide for BART trains that bypass the airport station, heading directly to or from San Francisco. What this really means is that airport service will be less frequent than otherwise. Not only will there [be] the possibility of boarding the wrong train, the "right" train for a particular flight time might not stop at the airport.

Response. Please refer to Response 58.1 for a discussion of service frequencies. The BART train schedule will clearly identify which trains are bound for either the airport or Millbrae. In addition, train destination signs inside the BART stations will show the destination of each train. The commentor can be assured that signs for BART trains to the airport will be just as clear as those currently used.

- 60.5. Our region, north and south, will best be served by a single transfer point BART/ALRS/CalTrain and BUS hub. The system must be designed to provide instant transfer, and to promote how quickly one can get to individual gates (timetables to the gate could be published). Until a study has been made that shows a passenger source and destination time distribution (number of minutes of travel time, scaled by inconvenience and volume) for the various options, I do not believe the EIR is complete.

Response. Please refer to Response 4.9 for a discussion of connectivity between the ALRS and CalTrain. Under every BART build alternative, a single transfer point would be available for BART, CalTrain, and SamTrans buses. Access travel time from the transit egress point to the terminal concourses at the airport, as well as estimates of transit patronage, were considered in the development of the Passenger Service Quality Standards. Publication of rail transit time tables to well over 100 airline gates at the airport is beyond the level of detail appropriate for the FEIR/FEIS.

- 60.6. Many flights, particularly east coast and Hawaii connections, dribble in until shortly after midnight. To be an effective system we can rely on to get us home, the new BART extension must promise to run at least a minimally buffered schedule, with trains until 20-30 minutes after the last batches of normally expected arrivals.

Response. BART currently provides service between 4:00 A.M. and 12:00 midnight/1:00 A.M. on weekdays, 6:00 A.M. and 12:00 midnight/1:00 A.M. on Saturdays, and 8:00 A.M. and 12:00 midnight/1:00 A.M. on Sundays. Typically, the last train run starts at the end of each line at approximately 12:00 midnight, and terminates at the other end of the line at approximately 1:00 A.M. BART has no plans to lengthen its hours of operations. Between the hours of 1:00 and 4:00 A.M., BART shuts off power to the third rail and performs routine maintenance.

The last northbound BART train would serve the Airport International Terminal Station at approximately 12:07 A.M., and air passengers and greeters would be unable to use BART for late night and early morning flights.

61. OLIPHANT, HOWARD

- 61.1. I don't really care how this [BART-SFO Extension] is handled as long as the cost is kept down and there is as little disruption as possible in the communities involved....

Response. BART will, in the spirit of the EIR/EIS, design the most cost-effective system and require its contractors to cause as little disruption as possible.

- 61.2. My major concern is that there be no interference with the fine service we receive from CalTrain - either during construction or afterwards.

Response. Please refer to Response 9.1 for a discussion of impacts to CalTrain service during construction. After completion of construction of the proposed BART extension, CalTrain service would not be affected. One of the assumptions in the transportation analyses is that CalTrain service would increase from 60 to 86 trains per day. The Peninsula Corridor Joint Powers Board (JPB) would decide if such service changes are to be made in the future.

62. PINCUS, MELVINS.

- 62.1. As an alternative I find that the new proposed Option B is an acceptable plan subject to additional mitigation measures that have been proposed by the City of Millbrae, and my own comments.

Response. The commentor's support for Alternative VI Aerial Design Option B, subject to additional mitigation measures proposed by the City of Millbrae, is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Mitigation measures and design refinements put forth by the City of Millbrae are discussed in Comment Letter 16, Chapter 3, Volume II, of this FEIR/FEIS.

- 62.2. The report unfortunately makes no reference to the significant environmental impact from traffic feeding off of: a. Highway 280N; b. Highway 280S; and c. Skyline avenue at Trousdale...there will be significant traffic from these roadway which will feed into Trousdale, and Hunt avenues in Burlingame, with subsequent flow into Murchison and Sebastian streets, Millbrae Avenue, and Larkspur, all in the westerly portion of Burlingame and Millbrae. In addition, additional traffic can be anticipated on lower streets in Millbrae, specifically on Ashton which runs into both Millbrae Avenue and Murchison. Traffic studies should be made in order to determine the extent of mitigation required which could include among others, additional arterial stops, stop lights, safety patrols at Spring Valley School, speed bumps and other measures recommended by the police department.

Response. The traffic studies performed for the DEIR/SDEIS examined the impacts on streets connecting I-280 and El Camino Real. Please refer to Response 7.6 for a discussion of traffic impacts relating to I-280 and use of Trousdale Avenue, Murchison Drive, and Millbrae Avenue. Hunt Avenue under the Alternative VI LPA would carry an insignificant number of vehicles, i.e., fewer than ten, related to the BART extension. Under the Alternative IV LPA, Ashton from Trousdale to Murchison Drive would carry approximately 50 BART-related vehicles during the A.M. peak hour in the year 2010 and 20 BART-related vehicles during the P.M. peak hour in the year 2010, an insignificant impact to this street. Larkspur Drive would not likely be used by traffic from I-280 because this road is considerably farther north than other available roads (such as Trousdale Drive, Millbrae Avenue, and Hillcrest Boulevard), and the route required to access the Millbrae Avenue Station is circuitous. Traffic from local residences may use Larkspur Drive to access the Millbrae Avenue Station. The addition of BART-related traffic from I-280 to the Millbrae Avenue Station would be similar for the Aerial Design Option LPA and would not result in significant traffic impacts on any of the roadways referenced in this comment.

- 62.3. Sound walls specified in mitigation should include trees to be planted to help overcome the visual impact to affected Millbrae residential areas.

Response. As noted under on Impact 3, page 3.3-2, of the DEIR/Technical Appendix, the sound wall in Millbrae and Burlingame will be landscaped.

- 62.4. I am particularly concerned about problems as it pertains to the Millbrae Elementary School District and to the Lomita school which is directly impacted by the plan. My concerns are particularly in terms of safety during construction and recovering the substantial loss in ADA (average daily attendance) moneys due to a decrease in student enrollment directly related to the Garden Lane area.

Response. Mitigation Measure 3.1, Coordination with Cities and Communities, on page 3.13-54 of the DEIR/Technical Appendix, requires that BART coordinate with cities and neighborhoods in the formulation of plans to minimize construction-related impacts on neighborhoods and schools. The measure specifically mentions a public information program to alert residents and businesses. Other measures, including those identified by the Millbrae School District, can be proposed and discussed with BART during the construction planning process.

As described on page 3.2-47 of the DEIR/Technical Appendix, Mitigation Measures for Impacts to Economic Activities in Millbrae, BART/SamTrans would address demonstrable loss of income to the Millbrae School District, in accordance with state and federal relocation laws as they apply to non-profit organizations and public agencies. Both measures described apply to the Aerial Design Option LPA.

63. RIECHEL, ROBERT M.

- 63.1. As a San Bruno property owner and concerned citizen, I desire that BART accept Design Option B: a station immediately in front of the planned new International Terminal.

Response. The commentor's support for Alternative VI Aerial Design Option B is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

64. SCHWARTZ, RICHARD S.

- 64.1. On page 1-6 of the document, it is stated that one of the reasons the BART-SFO Airport extension is being advanced is to respond to a regional need to alleviate highway congestion. In support of this objective, Table ES-2 simply states that Alternative VI and the Aerial Design Option will "reduce regional congestion." No quantitative data are provided in this table to support this statement; to the contrary, under each column of the table, it is noted that as a result of each alternative, there will be a significant reduction in level of service on Highway 101 south of the airport to unacceptable levels in 1998, continuing through the year 2010 and beyond.

Response. Table ES-2, Comparison of Key Impacts, of the FRDEIR/S#2DEIS, is a summary table that highlights important impacts. As such, quantitative details are not appropriate in this table, but are provided elsewhere. As the commentor notes, there would be a reduction in level of service on Highway 101 under each alternative, including the No Build Alternative, the TSM Alternative, and each BART build alternative. Table 3.10-5, Regional Vehicle Miles Traveled and Associated Air Emissions, in the DEIR/SDEIS, provides quantitative information on the reduction in vehicle miles traveled for the BART build alternatives. According to Table 3.10-5, daily VMT would be reduced by 484,811 miles, under all of the BART build alternatives, compared to the No Build Alternative in 2010. This reduction in VMT would reduce traffic congestion in the region on freeways as well as on local streets.

- 64.2. The manner in which the data are presented, i.e., that all alternatives "reduce" Highway 101 level of service, clearly seems to suggest that the deterioration in level of service of Highway 101 will be comparable for Alternative VI's (original plan and the Aerial Design Option), Alternative I, the No Build option, and Alternative II, the TSM Option, i.e., the Alternative VI's will be no worse than either Alternative I or II. I find the manner in which these data have been presented to be highly misleading and the conclusions drawn to be incorrect. Alternative II does not "reduce" the level of service on Highway 101; to the contrary, it improves the service.

Response. Page 3.1-133 of the DEIR/Technical Appendix provides a summary of significant impacts as well as cumulative impacts. It states, "Under the TSM Alternative, significant cumulative impacts in 1998 and 2010 are projected for freeway segments compared to the 1993 No Build Alternative." Although the level of service on Highway 101 would not improve under the TSM Alternative compared to the No Build Alternative, the number of vehicles would decrease between 100 and 500 vehicles, depending upon the time of day and the analysis year. Please refer to Response 64.1 for a discussion of reductions in Highway 101 use.

- 64.3. On page 3.1-117 of the original DEIR/Technical Appendix - Transportation/Traffic, it is stated that "the greatest traffic increase is forecast on the SFIA to Millbrae freeway segment. Traffic on this segment is projected to increase by as much as 16 percent in 1998 relative to existing conditions, due to area-wide traffic growth and BART access traffic...Projected traffic volumes under the TSM Alternative are substantially less than those forecast for all other alternatives."

Response. The quote in the comment is correct and appears in the DEIR/Technical Appendix under Cumulative Impacts (for 1998) Relative to the 1993 No Build. Appendix Table C-8, Freeway Level of Service - Year 1993 No Build and 1998 Build Alternatives, provides the basis for making these comparisons. The projected traffic increase of 16.1 percent, as compared to the No Build Alternative in 1993, occurs on the southbound segment of Highway 101 from the SFIA to Millbrae Avenue during the P.M. peak hour under Alternatives IV and V. Under the same conditions, the TSM Alternative

increases traffic by 5.7 percent, and the Alternative VI Locally Preferred Alternative (LPA) and the Aerial Design Option LPA both increase traffic by 4.6 percent over the No Build Alternative. The biggest decrease in Highway 101 traffic under the TSM Alternative relative to the 1993 No Build Alternative is 1.2 percent, which occurs during the P.M. peak hour from the Airport Boulevard exit to I-380. Under the Alternative VI LPA and the Aerial Design Option LPA, Highway 101 traffic decreases by 4.9 percent under the same conditions.

Please note that Appendix Table C-8, Freeway Level of Service - Year 1993 No Build and 1998 Build Alternatives, in the DEIR/Technical Appendix, contains an error under Alternative VI for the Poplar/Dore to 3rd Avenue segment of Highway 101 during the A.M. peak hour. The text in this table is revised as follows:

F ~~40,200 12.1%~~ 9,900 8.8%

- 64.4. "All build alternatives would result in improved conditions on certain freeway segments; nevertheless, significant and unavoidable impacts would occur with some alternatives." In the year 2010, the situation is far worse: on page 3.1-119, it is stated that "the increase in traffic will be 23 percent relative to existing conditions....Projected traffic volumes under the TSM Alternative are notably less than those forecast for all other alternatives."

Response. The quotes in the comment are correct and appear in the DEIR/Technical Appendix under Cumulative Impacts (for 2010) Relative to the 1993 No Build. Appendix Table C-14, Freeway Level of Service - Year 1993 No Build and 2010 Build Alternatives, provides the basis for making these comparisons. The projected traffic increase of 23.0 percent compared to the No Build Alternative in 1993 would occur on the southbound segment of Highway 101 from the SFIA to Millbrae Avenue during the P.M. peak hour under Alternatives IV and V. Under the same conditions, the TSM Alternative would increase traffic by 12.6 percent, and the Alternative VI LPA and the Aerial Design Option LPA would both increase traffic by 11.5 percent. The only instance when traffic on Highway 101 increases when comparing the TSM Alternative in 2010 to the 1993 No Build Alternative is during the A.M. peak hour from the Airport Boulevard exit to I-380. Under the Alternative VI LPA and the Aerial Design Option LPA, Highway 101 traffic decreases by 1.2 percent under the same conditions.

Please note that Appendix Table C-14, Freeway Level of Service - Year 1993 No Build and 2010 Build Alternatives, in the DEIR/Technical Appendix, contains an error under Alternative VI for the Poplar/Dore to 3rd Avenue segment of Highway 101 during the A.M. peak hour. The text in this table is revised as follows:

F ~~41,000 20.9%~~ 10,400 14.3%

- 64.5. I am attaching Table 3.1-74 from the original DEIR summarizing the freeway level of service in 1998. As shown in this table, Alternative II decreases the vehicular traffic on all stretches of Highway 101 south of Millbrae Avenue whereas Alternative VI increases vehicular traffic, resulting in degradation of the level of service (LOS) of "F" on all stretches of Highway 101 south of Millbrae extending to San Mateo, a distance of more than 5 miles. The changes were all significant and attributable to BART.

Response. The level of service (LOS) for northbound Highway 101 under the No Build Alternative is forecast to be LOS F from the Millbrae Avenue interchange to the 3rd Avenue interchange during the A.M. peak hour. During the A.M. peak hour, the level of service for southbound Highway 101 under the No Build Alternative is forecast to be LOS F from the Poplar Avenue interchange to the 3rd Avenue interchange and LOS E from the Millbrae Avenue interchange to the Poplar Avenue interchange. Under the Alternative VI LPA and the Aerial Design Option LPA, the BART extension project would have cumulative traffic impacts on northbound Highway 101, from the 3rd Avenue interchange to

Millbrae Avenue interchange during the A.M. peak hour in 1998, by increasing traffic between 300 and 500 vehicles, depending on the freeway segment. During the P.M. peak hour in 1998, these two alternatives would have a significant impact on Highway 101, between the Millbrae Avenue interchange and the Poplar Avenue exit, by adding 100 vehicles in the southbound direction, resulting in a degradation from LOS E to LOS F. Similar cumulative traffic impacts during the A.M. peak hour in the northbound direction, south of SFIA, would result from the Alternative VI LPA and the Aerial Design Option LPA in the year 2010, as in 1998. No significant impact would occur in the northbound direction during the P.M. peak hour in 2010, because the level of service is at LOS F under the No Build Alternative, and only 100 vehicles would be added by these two BART build alternatives.

Please note that Table 3.1-74, Freeway Level of Service - 1998, in the DEIR/Technical Appendix, contains an error under Alternative VI for the Poplar/Dore to 3rd Avenue segment of Highway 101 during the A.M. peak hour. The text in Table 3.1-74 on page 3.1-108 is revised as follows:

F 40,200 -6.3% 9,900 3.1%

A similar error is contained in Table 3.1-76, Freeway Level of Service - 2010, in the DEIR/Technical Appendix. The text in Table 3.1-76 on page 3.1-113 under Alternative VI for the Poplar/Dore to 3rd Avenue segment of Highway 101 during the A.M. peak hour is revised as follows:

F 41,000 -8.9% 10,400 3.0%

- 64.6. I have compiled an additional table (Table I, attached) comparing the vehicular traffic on Highway 101 south of the airport for Alternatives I (No Build), II (TSM), and VI (Millbrae Avenue BART) based on the data provided in Table 3.1-108 of the original. DEIR/Technical Appendix - Transportation/Traffic. As shown in this table, with Alternative VI, vehicular traffic increases substantially on Highway 101 south of the airport over and above the No Build option whereas Alternative II reduces traffic on Highway 101. Especially revealing is the direct comparison of Alternative VI versus Alternative II on Highway 101 vehicular traffic. It is apparent that the Alternative VI will increase traffic 8.4% - 10.9% above that of Alternative II on some stretches of Highway 101 south of the airport as far as 3rd Avenue in San Mateo beginning in 1998, the first year of operation of the proposed BART station and continuing through to the year 2010.

Response. As discussed in Response 64.5, two errors have been noted for freeway volumes for Highway 101 between Poplar/Dore to 3rd Avenue under Alternative VI during the A.M. peak hour, and their correction affects the numbers in the commentor's Table I. The largest increase in traffic on Highway 101 would actually occur during the A.M. peak hour between Broadway and Millbrae Avenues. In 1998, the traffic volumes on this segment are projected to be 9,300 vehicles under the No Build Alternative, 9,300 vehicles under the TSM Alternative, and 9,800 vehicles under the Alternative VI LPA (which is a 5.4 percent increase compared to the TSM Alternative). In 2010, the traffic volumes on this Highway 101 segment are projected to be 9,800 vehicles under the No Build Alternative, 9,800 vehicles under the TSM Alternative, and 10,200 vehicles under the Alternative VI LPA (which is a 4.1 percent increase compared to the TSM Alternative). According to the commentor's Table I, traffic on Highway 101 between Millbrae Avenue and the SFIA decreases by 2.1 percent in 1998 and by 2.9 percent under the Alternative VI LPA compared to the TSM Alternative. As stated in the DEIR/Technical Appendix on page 3.1-157, traffic volumes would increase on Highway 101 south of Millbrae Avenue and decrease north of Millbrae Avenue.

- 64.7. BART is also recommending the off-ramp from North-bound Highway 101 be reconfigured at Millbrae Avenue to a partial cloverleaf design with a stoplight at the intersection of Millbrae Avenue (page 3.1-13). From Figure 3.1-1, it appears that BART is recommending a stoplight for the southbound highway off-ramp to Millbrae Avenue as well. BART claims this change will "reduce the cumulative impact from the BART-SFO extension and background traffic to an insignificant level."

(page 3.1-14) To the contrary, these changes will result in a major backup of traffic along Highway 101 northbound in the morning and southbound in the afternoon, as regularly occurs for 1/4 to 1/2 mile on northbound Highway 101 at the Grand Avenue exit each weekday morning which is also controlled by a stoplight. In the afternoon, Highway 101 currently comes to a near halt in all lanes at Millbrae Avenue on a daily basis, with the only outlet being Millbrae Avenue. Adding a stoplight at the southbound exit ramp will greatly exacerbate this already intolerable situation and lead to near total gridlock.

Response. Please refer to Response 53.7 for a discussion of traffic operations of the proposed northbound ramps for the Millbrae Avenue interchange with Highway 101. If the southbound ramps are changed to a Par-Clo design, the same design considerations apply to the southbound ramps and traffic signal. The Highway 101 southbound mainline reduces from five lanes to four lanes at the Millbrae interchange. Currently, with the full cloverleaf interchange design, motorists traveling south can use the collector-distributor road and re-merge with the mainline at the southbound on-ramp. Increased traffic on this southbound on-ramp at times could saturate the on-ramp merge to the Highway 101, causing a backup along the collector-distributor road and onto the freeway. The Par-Clo design of the southbound ramps would eliminate the possibility for queues backing onto the mainline due to congestion at the merge, because it physically separates the on-ramp from the off-ramp.

- 64.8. One of the stated goals of bringing BART to the Peninsula is to provide mass transit and to relieve highway congestion. However, in reviewing the DEIR and FRDEIR, it is evident that the BART extensions will have just the opposite effect on Peninsula freeway traffic.

Response. Please refer to Responses 64.1 through 64.5 for a discussion of impacts to highway congestion.

- 64.9. According to BART's own analysis, the proposed BART station on Millbrae Avenue will lead to significantly greater traffic on Highway 101 south of the airport resulting in LOS of F, the most severe level of freeway flow degradation with volume exceeding capacity of the highway for the entire length of Highway 101 extending from Millbrae Avenue to at least 3rd street in San Mateo and more likely to Highway 92, a distance of more than 7 miles. This massive traffic congestion will be intolerable and unacceptable to commuters of San Mateo and Santa Clara Counties.

Response. Please refer to Response 64.5 for a discussion of traffic impacts to Highway 101 south of the SFIA under the Alternative VI LPA and the Aerial Design Option LPA.

- 64.10. Immediately after the BART Millbrae station opens in 1998, it will be far more difficult for peninsula commuters and air-travelers from all of San Mateo County south of the airport and all of Santa Clara County to reach the airport on Highway 101 than is currently the case.

Response. Commuters and airline passengers going to SFIA from south of the airport would have an improved transit option with the BART-San Francisco Airport Extension. These travelers would be able to ride CalTrain to Millbrae Avenue and take BART to the Airport International Station under the Alternative VI LPA or the Aerial Design Option LPA. Under the other BART build alternatives, CalTrain riders would transfer at a station external to the SFIA to the Airport Light Rail System (ALRS) for access into the airport. Please refer to Response 64.5 for a discussion of impacts to Highway 101 south of the SFIA under the Aerial Design Option LPA.

- 64.11. Starting in 1998, the FDEIR/S#2DEIS projects that the intersection of El Camino Real and Millbrae Avenue will operate at level of service E in the morning and D in the afternoon, El Camino Real and Murchison will operate at level D in the morning and C in the afternoon, California and Broadway will operate at level D throughout the day (Appendix B of the FRDEIR). These levels of service will lead to unacceptably long queues with vehicular traffic approaching the volume capacity of the roads

affected...This means that the access routes to Highway 101 for Millbrae and Burlingame will become extremely congested for most of the day.

Response. According to the San Mateo County Congestion Management Plan (CMP), LOS D is generally considered an acceptable level of traffic congestion. The intersection of Broadway and California Drive has LOS D during the A.M. and P.M. peak hours under the No Build Alternative in 1998 and remains at the same level of service under the Aerial Design Option LPA. The LOS D during the A.M. and P.M. peak hours under the Aerial Design Option LPA at the intersection of El Camino Real and Murchison Drive is not a significant impact. The intersection of El Camino Real and Millbrae Avenue has LOS D during the A.M. peak hour and LOS C during the P.M. peak hour under the No Build Alternative in 1998 and would be LOS E during the A.M. peak hour and LOS D during the P.M. peak hour under the Aerial Design Option LPA and Alternative VI in 1998. The decrease in LOS during the A.M. peak hour under Aerial Design Option LPA and Alternative VI is noted as a significant and unavoidable impact on page 3.1-160 of the DEIR/Technical Appendix. Please refer to Response 7.4 for a discussion of possible improvements to the intersection of El Camino Real and Millbrae Avenue.

- 64.12. Broadway Avenue in Burlingame, a major shopping district with only one lane in each direction, will become even more congested than currently, which is already considered by most to be intolerable.

Response. According to the subarea traffic model, BART-related traffic would not travel on Broadway west of Rollins Road because routes involving this roadway segment to the Millbrae Avenue Station would take longer than routes utilizing Broadway. Please refer to Response 4.10 for a discussion of traffic impacts to the intersection of Broadway and Rollins Road.

- 64.13. Millbrae Avenue in Millbrae and Broadway Avenue in Burlingame will become virtually impassable if the Millbrae BART station is constructed....According to Table 3.1-1 of the FRDEIR/S#2DEIS, BART is projecting 29,000 passengers will board BART at the Millbrae Avenue station daily in 1998. This is nearly 2.5 times that of the Daly City station, twice that of the Colma station, 4 times the Hickey Station, and 3.4 times the Tanforan Station (Table 3.1-3). By the year 2010, it is projected that 31,000 passengers will board BART on Millbrae Avenue daily (Table 3.1-3).

Response. Please refer to Response 7.4 for a discussion of impacts to Millbrae Avenue at the intersection with El Camino Real and to the Millbrae Avenue interchange with Highway 101. Broadway Avenue would not be significantly impacted by BART-related traffic under the Alternative VI LPA or the Aerial Design Option LPA. Please refer to Response 4.10 for further discussion of traffic impacts to Broadway Avenue in Burlingame. Access to the Millbrae Avenue Station would be by CalTrain, bus, and walk/bicycle in addition to vehicle. The parking demand is forecast for 2,000 vehicles. Additional vehicles would drop off or pick up BART patrons.

- 64.14. The Millbrae Avenue overpass currently under construction at a cost of millions of dollars will be obsolete on the day it opens, inadequate to handle the sever pressure which will result from the BART station on Millbrae Avenue.

Response. Please refer to Response 20.4 for a discussion of improving the Millbrae Avenue overpass to the CalTrain tracks.

- 64.15. The extreme congestion on Millbrae Avenue will be intolerable and unavoidable unless major modifications are made to the overpass and even then there is no guarantee. It is unclear from the report who would pay for these additional modifications - BART only indicates it would contribute "its fair share" which is not defined, even though BART would be the cause of the entire problem. Does this mean that the City of Millbrae will have to fund additional costly modifications and land acquisition?

Response. Please refer to Response 7.4 for a discussion of fair share payment for improvements to the El Camino Real and Millbrae Avenue intersection.

- 64.16. The level of service predicted in the FRDEIR/S#2DEIS for the intersection of Broadway and California Drive in Burlingame is based on commuters using this intersection to access the Millbrae BART Station. However, with the extreme congestion predicted for Millbrae Avenue, it is likely that many more commuters will of necessity need to use the Broadway Avenue/California Drive access to Highway 101 since the Millbrae Avenue access will be so congested. It is likely therefore that the level of service for the Broadway/California Drive intersection projected in the FRDEIR/S#2DEIS considerably underestimates the problems which will occur at this intersection.

Response. California Drive would not be a viable route to the Millbrae Avenue Station because of the Millbrae Avenue railroad grade separation project. Without access from California Drive to Millbrae Avenue after completion of the grade separation, it would be difficult to use California Drive to gain access to the Millbrae Avenue Station. Northbound drivers on California Drive would turn left at Trousdale Avenue or at Murchison Drive, right on El Camino Real, right on Millbrae Avenue, and finally left on Rollins Road, serving the Millbrae Avenue Station. With the grade separation currently under construction, Millbrae Avenue would no longer be subject to the delays associated with the railroad gate closings. Broadway would continue to be more congested than Millbrae Avenue, because 1) the traffic signals are more closely spaced on Broadway, 2) it is subject to the delays with the railroad gate closings, and 3) its capacity is reduced as it goes through the densely commercial section of Broadway. Further, the congestion referenced on Millbrae Avenue would be related to the intersection with El Camino Real. Commuters to and from the Millbrae Avenue interchange would use the intersection of Millbrae Avenue and Rollins Road, which would be improved with the Millbrae Avenue Station.

- 64.17. The heavy congestion that will occur at the intersection of Broadway and California Drive in Burlingame as a result of the Millbrae BART Station will create additional severe problems which will need to be remedied immediately; the Highway 101 exit off-ramps to Broadway Burlingame are already nearing total capacity and are subject to marked congestion during major commute hours and even midday now. The massive traffic which will result from the Millbrae BART Station can only lead to a marked exacerbation of this already intolerable situation.

Response. Please refer to Response 64.18 for a discussion of traffic impacts at the intersection of Broadway and California Drive. Please refer to Response 20.4 for a discussion of traffic impacts at the Broadway interchange with Highway 101. The subarea traffic model predicts that motorists accessing the Millbrae Avenue Station from Highway 101 would use the Millbrae Avenue interchange, and that an insignificant number of BART-related vehicles would use the Broadway interchange. Please also refer to Response 64.16 for further discussion of impacts to Broadway.

- 64.18. It is probable a very costly overpass or underpass to circumvent the railroad crossing at Broadway and California will be required as soon as the BART station opens. This will undoubtedly result in the loss of numerous business along both Broadway and California Avenues.

Response. An overpass or underpass to Broadway at the CalTrain tracks would not be required as a result of the Alternative VI LPA or the Aerial Design Option LPA because the project would not add a significant number of vehicles on Broadway and would not significantly degrade level of service on Broadway. Under the Aerial Design Option LPA in 2010, of the approximately 2,200 vehicles that use Broadway during the P.M. peak hour to cross the CalTrain tracks, the subarea model projects that less than 20 vehicles would be going to or from the Millbrae Avenue Station. Please also refer to Response 64.16 for further discussion of impacts to Broadway.

- 64.19. The BART station on Millbrae Avenue will lead to intolerable local congestion on the major thoroughfares in Millbrae and Burlingame as well as in other North County cities. Rather than alleviating congestion, BART will lead to intolerable local conditions.

Response. Please refer to Response 7.4 for a discussion of impacts to Millbrae Avenue at the intersection with El Camino Real and to the Millbrae Avenue interchange with Highway 101. Broadway Avenue would not be significantly impacted by BART-related traffic under the Alternative VI LPA or the Aerial Design Option LPA. Please also refer to Response 64.16. Please refer to Response 4.10 for further discussion of traffic impacts to Broadway in Burlingame and to Response 6.24 for a discussion of improved traffic conditions under the Aerial Design Option and mitigation of significant traffic impacts.

- 64.20. One of the stated goals of the FRDEIR/S#2DEIS is to “carry out the public mandate for the project” i.e., to bring BART into the San Francisco Airport. However, in reviewing Table 3.1-5 of the FRDEIR, it is apparent that in 1998, the first year of planned operation of the BART extension, less than 5,900 out of 120,700 (<4.9%) daily air passengers (defined as air passengers + visitors + greeters), less than 4,400 of 70,500 (<6.2%) individuals who work at the airport, and less than 10,300 of 191,200 (<5.4%) daily trips to the airport overall for all reasons combined will arrive at the airport by BART....The percentages using BART to access the airport are...virtually identical in 1998 and 2010 and based on BART’s own data, will remain extremely low, representing only a tiny fraction of all daily trips to the airport by air passengers, workers, and for all reasons combined. In contrast, 100,300 out of 120,700 (83.1%) air passengers 63,800 out of 70,500 (90.4%) airport workers, and 164,100 out of 191,000 (85.9%) total daily trips to the airport for all reasons combined will arrive at San Francisco Airport by automobile in 1998 (Table 3.1-5). In the year 2010, 123,800 out of 149,000 (83.1%) air passengers, 79,400 out of 87,800 (90.4%) airport workers, and 203,200 out of 236,800 (85.8%) total daily trips to the airport for all reasons combined will arrive at San Francisco Airport by automobile in the year 2010 (Table 3.1-5).

Response. Please refer to Response 32.1 for a discussion of changes in transit patronage to the SFIA with the BART extension.

- 64.21. Based on the figures in Table 3.1-5, it is also evident that number of air-passengers/greeters/visitors reaching SFO by BART will increase by less than 900 daily trips from 1993 to 1998 and by less than 2,300 daily trips over 1993 by the year 2010. As summarized in Appendix A of the FRDEIR/S#2DEIS, only 4,238 air passengers/greeters/ visitors per day are projected to arrive or depart the airport by BART in 1998 and only 5,232 per day in the year 2010. These represent just a small fraction of the total number of air passengers passing through the airport on a daily basis.

Response. Please note that in Table 3.1-5, Alternative VI Aerial Design Option Daily Trips by Mode to SFIA, in the FRDEIR/S#2DEIS, CalTrain trips to the SFIA are listed separately from BART trips, but these riders would also use BART to access the SFIA and were not included in the BART ridership in Table 3.1-5. Therefore, the total increase (air passengers, work-related, and other) in trips between 1993 and 1998 is 2,800 trips, and 6,300 trips between 1993 and 2010, under the Aerial Design Option LPA. The numbers cited in the comment relating to Appendix Table A, BART Station Entries and Exits, in the FRDEIR/S#2DEIS, include only half the daily air passengers. The 4,238 air passengers indicated include the daily number of trips going to the SFIA under the Aerial Design Option LPA in 1998, plus another 4,238 daily trips departing SFIA for other destinations. This same explanation applies to numbers for the year 2010.

- 64.22. It has been widely perceived that the reason for the need for BART to reach SFO is to enable East Bay air travelers and airport employees to reach SFO more easily. However, based on BART’s own data, BART will account for less than 4.9% of “air passenger/greeter/visitors,” less than 6.3% airport workers, and less than 5.4% of total daily trips to SFO, even by the year 2010. Amazingly, air passengers arriving by BART will account for less than 3.1% of total daily trips to the airport....The

percentage [of “true” air-travelers] arriving from the East Bay will be substantially less, perhaps half that or only 1.5% of total daily trips to SFO. These figures are trivial considering the fact that there will be more than 191,000 daily trips to SFO in 1998 and 237,000 daily trips in the year 2010 on any given day (Table 3.1-5).

Response. Please refer to Response 32.1 for a discussion of changes in transit patronage to the SFIA with the BART extension.

- 64.23. The vast majority of daily trips are made to the airport by automobile and will continue to be so out to the year 2010 based on BART’s own data. The severe highway congestion on Highway 101 which will result from the BART Millbrae station will therefore have a major detrimental impact on access to SFO by Highway 101, the only access route to the airport. Once the BART Millbrae station opens in 1998, it will be far more difficult for tens of thousands northbound commuters, air-travelers, and airport workers to reach the airport by automobile from anywhere south of the airport including most of San Mateo County and all of Santa Clara Counties due to the greatly increased congestion predicted along the Highway 101 corridor as well as the local access routes. This is especially disturbing since 67% of airport employees live south of the airport.

Response. Please refer to Response 6.10 for a discussion of SFIA employees living south of the airport. Please refer to Response 64.10 for a discussion of access to the airport on Highway 101. Motorists accessing the SFIA will continue to have a less congested freeway route via I-280 and I-380.

- 64.24. That approximately 1.1 billion dollars is being expended to extend BART only 7 miles from the Colma station to SFO for such a small percentage of air travelers + “greeters/visitors” as well as workers is astounding, especially given the major detrimental effect the BART extension and Millbrae station will have on the level of service on Highway 101 and on numerous major intersections throughout the peninsula. Clearly, these statistics do not justify the enormous expense of the BART extension on a cost per individual basis.

Response. Please refer to Response 23.2 for a discussion of the reasons the BART extension is proposed by BART and SamTrans.

- 64.25. Table 3.1-1 of the FRDEIR/S#2DEIS compares transit travel times for selected destinations on BART. The sites selected are all the most favorable to BART. Of greater interest to commuters on the Peninsula would have been the commute times on CalTrain assuming a central downtown extension is built. Because BART will have to make 11 stops and go around San Bruno Mountain, a trip downtown emanating in Millbrae will take 45 minutes. The same trip on CalTrain will currently takes 25 minutes due to the fact that the CalTrain route is direct and makes only 5 stops, saving 20 minutes (40 minutes per day round-trip).

Response. The travel times are included in Table 3.1-1, Alternative VI Aerial Design Option Transit Travel Times, in the FRDEIR/S#2DEIS, and were not selected to show the BART extension in a favorable light. Mapping out the locations in the table would indicate that a representative sample of the most popular destinations was chosen. Some of the destinations in Table 3.1-1 indicate worse travel times with the BART extension, due to reduced service on some SamTrans routes. However, most locations would have improved travel times, and this improvement is a benefit of the BART extension. Please refer to Response 6.11 and 64.26 for a discussion of travel time comparisons between the BART–San Francisco Airport Extension and CalTrain.

- 64.26. It is evident that CalTrain will offer a faster and more convenient method of commuting to the downtown core area for peninsula commuters (San Mateo and Santa Clara Counties extending to Gilroy) if the train terminal is relocated to a central location, preferably the Transbay Terminal. If the CalTrain system is upgraded including electrification, faster trains, and more frequent service, the ridership on CalTrain would be expected to increase substantially, likely greatly alleviating congestion

on Highway 101 throughout all of San Mateo and Santa Clara Counties as far away as Gilroy. If CalTrain is rerouted through SFO, the travel time from San Francisco to the airport could be cut from 45 minutes on BART to less than 25 minutes.

Response. If CalTrain were extended to downtown San Francisco, CalTrain could possibly provide shorter travel times to the SFIA, depending upon the station location and train speeds, for people who start their trip within approximately one-half mile of the Downtown CalTrain Station. However, if CalTrain were extended to the Transbay Terminal, for example, and a person began their trip near the Civic Center to travel to the SFIA, then BART would be the faster alternative. BART would be faster from many more locations in San Francisco, because it has more extensive coverage along the Market Street corridor. Please refer to Response 6.11 for further discussion of travel time comparisons between the BART extension and CalTrain.

- 64.27. the TSM Alternative will reduce vehicular traffic on Highway 101 and at local major intersections and is the only Alternative to do so yet will cost less than 1/5 (<20%) of Alternative VI on an annualized capital cost basis...

Response. While the TSM Alternative clearly does not require the capital cost investment of a BART Build alternative, it also does not result in a comparable level of transit service to San Mateo County. Moreover, while the proposed BART extension would increase traffic at intersections near stations at certain hours, it would also result in an increase of 13,800 regional trips made via transit every day over the TSM Alternative, suggesting that greater regional improvements in traffic congestion and air quality are associated with the BART extension compared to the TSM Alternative.

Please refer also to Response 18.22 regarding selection of the Aerial Design Option as the LPA.

- 64.28. Alternative VI costs 5.3 fold more yet will result in intolerable congestion on a major portion of Highway 101 through much of San Mateo County and at many local intersections.

Response. Please refer to Response 64.10 for a discussion of congestion on Highway 101 with the BART extension. Please refer to Response 6.24 for a discussion of improved traffic conditions under the Aerial Design Option LPA and the mitigation of significant traffic impacts. Please refer to Responses 64.1 through 64.5 for a discussion of impacts to Highway 101 under the Aerial Design Option LPA. Please also refer to Responses 64.12, 64.13, 64.16, and 64.17 regarding various local intersections.

- 64.29. It is obvious that Alternative II, the TSM Alternative, is a far better value than Alternative VI for commuters of San Mateo as well as Santa Clara Counties.

Response. The commentor's support for Alternative II (TSM) is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Section 1.3 of the DEIR/SDEIS, which explains the need for the project, and to Response 23.2 of this FEIR/FEIS for a discussion of the studies demonstrating the need for a rail transit project south of Colma.

- 64.30. It is evident throughout the FRDEIR/S#2DEIS that the authors have intentionally minimized the deleterious impacts of BART on the environment and seismic safety, frequently citing the effects after mitigation measures as "insignificant."

Response. As required, the seismic impacts associated with the Aerial Design Option, before and after possible mitigation, are discussed in the FRDEIR/S#DEIS. For example, Impact 2 on page 3.6-2 classifies the impact of strong groundshaking on the aerial wye-stub and Airport International Terminal Station as significant. However, adherence to BART Seismic Design Criteria, which call for

structures of the BART extensions program to be built with sufficient ductility to undergo the effects of the “maximum credible earthquake” without significant damage, will reduce this impact to an insignificant level. Please refer to Response 35.2 for a discussion of seismic safety.

- 64.31. It is evident throughout the FRDEIR/S#2DEIS that the authors have intentionally minimized the deleterious impacts of BART on the environment...[An example follows:] Eucalyptus trees along the BART/CalTrain mainline right-of-way in San Bruno will be replaced with a 15-20 foot soundwall. The FRDEIR/S#2DEIS notes that “the wall would not result in visual disturbance” and with replacement of Eucalyptus trees with a sound wall “resulting in no net change in terms of views of the open space area.”

Response. Please refer to Response 53.10 regarding the sound wall.

- 64.32. It is evident throughout the FRDEIR/S#2DEIS that the authors have intentionally minimized the deleterious impacts of BART on the environment...[An example follows:] Loss of the eucalyptus trees along the CalTrain right-of-way in Burlingame will be “offset by the proposed landscaping of the wall.”

Response. As few trees as possible would be removed for the sound wall. It is likely however, that all trees within the BART right-of-way on the east side of the CalTrain tracks would need to be removed. Landscaping around the sound wall would have a positive visual effect, although the original number of trees and density of vegetation will not be replaced.

- 64.33. It is evident throughout the FRDEIR/S#2DEIS that the authors have intentionally minimized the deleterious impacts of BART on the environment...[An example follows:] Ancillary facilities near Sylvan Avenue will have 15 foot profiles yet “would not obstruct significant views.”

Response. The ancillary facilities proposed for installation near Sylvan Avenue would not be considered an impairment of visual quality because there are no high-quality views or scenic resources in this area.

- 64.34. It is evident throughout the FRDEIR/S#2DEIS that the authors have intentionally minimized the deleterious impacts of BART on the environment...[An example follows:] A 25-foot antenna would be visible but would not constitute a significant alteration to the built environment or obstruct views. Although the antenna is tall, it would be so narrow that view would still be available around it.”

Response. A narrow, 25-foot antenna would not, in fact, obstruct views or significantly alter the visual environment. The antenna would be located on the site of the existing CalTrain station and, when viewed in the context of the station and BART facilities, would not create a significant alteration to the built environment or impair visual quality.

- 64.35. It is evident throughout the FRDEIR/S#2DEIS that the authors have intentionally minimized the deleterious impacts of BART on the environment...[An example follows:] “The guideway and ramps would also be visible from higher elevations in Millbrae and San Bruno but only a small portion of the overall viewshed would be affected. The cumulative effect on distant views would therefore not be significant.”

Response. Cumulative visual effects must be considered in the context of the surrounding environment. As described in paragraph four, sentence six, on page 3.3-4 of the FRDEIR/S#2DEIS, the intensification of use on SFIA property would be viewed in the context of the existing highway structures, including the I-380 viaduct and Highway 101 flyover. When viewed from a distance, the intensification of use would be less apparent. Since only a small portion of the overall viewshed would be affected, the cumulative visual impact is considered insignificant.

- 64.36. It is evident throughout the FRDEIR/S#2DEIS that the authors have intentionally minimized the deleterious impacts of BART on the environment...[An example follows:] Creation of sound walls will reduce airborne noise impacts exceeding 75 dBA to an "insignificant level."

Response. The FRDEIR/S#2DEIS has indicated where significant noise impacts are expected to occur. Mitigation for reducing these impacts to insignificant levels is presented on pages 3.9-2 to 3.9-6, of the FRDEIR/S#2DEIS, after each significant impact.

- 64.37. It is evident throughout the FRDEIR/S#2DEIS that the authors have intentionally minimized the deleterious impacts of BART on the environment...[An example follows:] Effect on a house in San Bruno potentially eligible for inclusion in the National Register: "Implementation of BART service along the existing tracks would be in keeping with the right-of-way's historic setting." (page 3.4-2)

Response. Implementation of BART service would not have an adverse effect on the setting of the residence at 540 San Antonio Avenue referred to in the FRDEIR/S#2DEIS, because the proposed landscaping associated with the sound wall would, as stated in the document, replicate the existing greenery. The sound wall would be located across the street from the potentially eligible structure but would not significantly alter its setting near the existing CalTrain tracks, particularly since the sound wall would be landscaped.

- 64.38. It is evident throughout the FRDEIR/S#2DEIS that the authors have intentionally minimized the deleterious impacts of BART on the environment...[An example follows:] Implementation of the same mitigation measures...would reduce the impact of ground shaking at all proposed facilities in the study area to an insignificant level (page 3.6-2).

Response. Please refer to Response 35.2 for an explanation of BART's Seismic Design Criteria and seismic safety.

- 64.39. The purpose of an Environmental Impact Report is to provide a fair and objective assessment of the impact of the project. Sadly, it appears that the FRDEIR/S#2DEIS lacks such objectivity. The biases, misrepresentations, misleading facts and minimalizations of serious environmental effects and seismic safety concern suggest the report was written by a public relations firm rather than a group with total objectivity.

Response. The commentor's opinion of the FRDEIR/S#2DEIS is noted. The FRDEIR/S#2DEIS was written in the same manner and with the same diligence as the DEIR/Technical Appendix. The information and analysis contained in this document satisfy the standards and requirements of both the California Environmental Quality Act and the National Environmental Policy Act.

- 64.40. If BART must be extended to the airport which for the reasons I have summarized I strongly oppose, at the most, it should terminate at the airport and not continue on to Millbrae Avenue...

Response. The commentor's support for the BART-San Francisco Airport Extension with no station in Millbrae is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for further discussion of selection of the LPA.

- 64.41. BART should be linked to CalTrain at the transbay Transit Terminal which is the most logical location for a linkage, not on Millbrae Avenue.

Response. Providing a BART/CalTrain intermodal connection in northern San Mateo County has been a cornerstone and integral part of all build alternatives evaluated in the Alternatives Analysis conducted by the Metropolitan Transportation Commission (MTC) and the DEIR/SDEIS led by BART and SamTrans. In order to maintain and enhance existing and proposed commuter service, it is

necessary to offer a connection between BART and CalTrain at an intermodal station in northern San Mateo County. The ability to transfer between BART and CalTrain improves the regional transit system, allows additional mobility for transit-dependent individuals, and provides regional transit access for the people of San Mateo County.

All of the BART build alternatives under study in this environmental analysis contain a BART/CalTrain intermodal station in northern San Mateo County. For example, under the Aerial Design Option LPA, an at-grade station at Millbrae Avenue would provide an intermodal connection among BART, CalTrain, and SamTrans buses. This station would provide a convenient connection or transfer point between CalTrain and BART, which serve different station destinations in San Francisco.

A Downtown CalTrain Station at the Transbay Terminal is within a 0.3-mile walking distance of many jobs in downtown San Francisco, especially in the South of Market area, but is less accessible to the entire Financial District, which is a major job center. It would be inconvenient for CalTrain patrons to walk approximately one block between a CalTrain Transbay Terminal Station and transfer at BART Embarcadero Station in order to backtrack on BART to Union Square or the Civic Center. By comparison, the four BART stations on Market Street provide 0.3-mile walking distance access to a greater number of jobs in downtown San Francisco, including the Financial District (the TransAmerica Pyramid and the Embarcadero Center), Union Square, and the Civic Center.

- 64.42. Access to the San Francisco Airport could be achieved by connection with the Airport Light Rail System (ALRS) or possibly by rerouting CalTrain directly into the airport. Either mode would greatly benefit both air-travelers as well as airport workers coming from the north as well as the south.

Response. Please refer to Response 4.9 for a discussion of connectivity between the ALRS and CalTrain. CalTrain trains require a 24-foot clearance above the rail. If CalTrain were to enter the airport, the most likely alignment would be in a bored tunnel, as a cut-and-cover method would unacceptably disrupt SFIA operations. The CalTrain tunnel would be approximately 30 feet in diameter. In contrast, BART train clearances require only a 17.5-foot-diameter tunnel. The top of the tunnel should be 30 feet below the surface for CalTrain or about 55 feet to station level, while BART's would only be 45 feet. The volume of excavation per foot for CalTrain would exceed that of BART three-fold. The cost for such a large tunnel, under CalTrain's requirements, would be approximately two to three times BART's projected cost, or about \$1 billion.

- 64.43. I hope it is not too late for BART and the Peninsula Corridor Joint Powers Board to see the wisdom of [upgrading CalTrain] which has received widespread support among the communities of the Peninsula, for good reason. It is no coincidence that numerous communities along the Peninsula are already building overpasses to the CalTrain system to enable it to operate more efficiently. Clearly, the Peninsula communities are investing in the CalTrain system and its future.

Response. The commentor's support for upgrading the existing CalTrain system is noted. Please refer to Response 6.8 for a discussion of the study of the CalTrain extension to downtown San Francisco. Please refer to Response 10.3 for a discussion of the implications of the BART project for future CalTrain service and improvements. Please also refer to Response 22.1 for a discussion of the proposed alternatives and upgrades to CalTrain considered in the *CalTrain San Francisco Downtown Extension/System Upgrades Final Report*, March 1994.

- 64.44. I urge BART and SamTrans to immediately abandon the proposed plan to extend BART beyond Colma and to redirect their efforts to creating a true mass-transit system benefiting the entire Bay region, built upon an upgraded 77 mile CalTrain system with a linkage to BART in San Francisco.

Response. The commentor's opposition to the BART–San Francisco Airport Extension and support for an upgraded CalTrain system is noted. Public input regarding the merits of the different

alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the LPA in November 1995. Please refer to Response 10.3 for further discussion of the selection of the LPA and the implications of the BART project for future CalTrain services and improvements. Please refer to Response 6.8 for a discussion of the study of the CalTrain extension to downtown San Francisco. Please also refer to Section 1.3 of the DEIR/Technical Appendix, which explains the need for the project, and to Response 23.2 of this FEIR/FEIS for a discussion of the studies demonstrating the need for a rail transit project south of Colma.

65. SPENCER, VONNIE

- 65.1. After serious consideration, the undersigned residents and homeowners of Millbrae are against a BART station anywhere in Millbrae. We do hereby petition the Millbrae City Council, SamTrans, and the BART Board Members to abandon any plans for a BART station in Millbrae, CA.

Response. The commentors' opposition to a BART station in the City of Millbrae is noted. Public input regarding the merits of the different alignment and station alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. BART is working with the City of Millbrae to revise the conceptual plan for the Millbrae Avenue Station to incorporate many of the city's proposed modifications.

BART is proposing to modify the Millbrae Avenue Station under the Aerial Design Option LPA to incorporate many features of the Millbrae Avenue Station Area Concept Plan submitted by the City of Millbrae. Changes proposed relating to the parking structure include rotation of its axis 90 degrees and provision of a substantial setback from Millbrae Avenue that will be occupied by an extension of the station plaza. As modified, the garage will be out of scale with the nearby residential neighborhood. However, with these changes, no new significant impacts were identified.

66. ST. BRUNO'S CHURCH

- 66.1. We wish to reaffirm our support of Locally Preferred Alternative VI with a bored tunnel through San Bruno. ...We wish to reiterate the fact that we do not approve of other under grounding methods, such as "cut and cover."

Response. The commentors' support for the Alternative VI Aerial Design Option with a bored tunnel configuration through the City of San Bruno is noted. Please refer to Response 24.1 of this FEIR/FEIS for a discussion of the bored tunnel construction method through San Bruno under Alternative VI, which was found to be infeasible due to a number of unmitigable impacts.

- 66.2. We request a report on the comparative cost between the bored tunnel through San Bruno and the "cut and cover" tunnel through San Bruno. We understand that the primary reason for moving toward doing a "cut and cover" tunnel is the analysis that this is most cost effective. We request confirmation of this understanding or explanation of how we are in error.

Response. Please refer to Response 24.1 for a discussion of costs associated with bored tunnel versus cut-and-cover construction.

- 66.3. If the additional cost projected for a bored tunnel is not excessive, we request an opportunity to explore creative financing measures the difference.

Response. The commentors' remarks are noted. Please refer to Response 6.69 for a discussion of the role of the cities in funding the project.

- 66.4. We oppose all temporary storage yard and staging area alternative areas located in the vicinity of Belle Air Elementary School.

Response. Please refer to Responses 6.64 and 8.36 for a discussion of coordination efforts with local community organizations to jointly determine the least disruptive construction plan and to maximize measures for the protection and safety of local residents and school children at Belle Air Elementary School.

- 66.5. If the bored tunnel is determined not to be feasible, we request all mitigations and that they be fully funded.

Response: Please refer to Responses 24.1, 66.2, and 66.3 regarding BART's rationale for the use of cut-and-cover rather than bored tunnel techniques in San Bruno. As for mitigation measures, BART will prepare a Mitigation Monitoring Program presenting all feasible mitigation measures that would be implemented to avoid or reduce significant adverse environmental impacts resulting from the BART project. Any significant adverse impacts that could not be mitigated must be summarized in the findings, and a Statement of Overriding Considerations must be prepared to explain how the net benefits of the project would outweigh the negative aspects of any unmitigatable significant impacts. Please refer to Response 6.77 for a more detailed description of BART's responsibilities related to mitigation measures.

67. STEIN, GEORGE AND STEFANI, PAUL

- 67.1. We run the Java Junction, a business located in the historic train station. We were alarmed by the BART proposal to build a new station on the north side of Millbrae Ave. and move this historic building that our Cafe is housed in. Our business derives 70 percent of its revenues from train passengers and 30 percent from surrounding businesses and residents. If the station platform is moved away from the historic building where we are located our business will cease to be viable. It also looks like the parking lot will be eliminated which would hurt the remaining 30 percent of our business....If BART pursues its present proposal the Java Junction will suffer large financial losses.

Response. Based on recent engineering, BART has determined that the historic Millbrae CalTrain Station will not be moved during project construction. Some CalTrain passengers will board the system at the new BART Millbrae Avenue Station. However, some CalTrain patrons will also continue to park south of the existing historic Millbrae CalTrain Station and/or use the existing station to wait for trains and purchase tickets. Therefore, the business occupant may become eligible for relocation assistance benefits subsequent to an adopted project, in the event the business is displaced.

68. TAYLOR, KIM

- 68.1. I Support Option B.

Response. The commentor's support for Alternative VI Aerial Design Option B is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

- 68.2. From my experience in European airports, there were two keys to using public transport: free luggage carts and being able to walk with the carts to the bus/train platform. With those two things, I do not feel a light rail system is necessary.

Response. Under the Passenger Service Quality Standards adopted by the BART Board of Directors on September 12, 1995 and by the San Francisco International Airports Commission on September 19, 1995, BART baggage check-in would be provided at both ends of the BART platform. At least

50 percent of passengers arriving on BART would be able to reach the first ticket counter at their selected airline terminal location from the midpoint of the BART platform within a four- to five-minute walk without transfers. In addition, easy access to the Airport Light Rail System (ALRS) would be provided one level above the BART station via escalator or elevator.

- 68.3. The one change you seem to need in the current plans to allow access (instead of transit transfer) is to create a path from terminals C and B across to the “G” wing of the new international terminal.

Response. The departures level of the new International Terminal provides for pedestrian access between the BART station and Terminals B and C along the eastern face of the main ticketing hall. Patrons would have to go down one level via escalators, stairs, or elevator from the International Terminal to the departures level of existing Terminals B and C.

69. VERNON, BRUCE

- 69.1. Upon review of the above document, it is obvious that there is a serious flaw in the figures used to justify any BART extension, as opposed to expanding existing transportation systems, i.e. Caltrain....In Table ES-2 on page ES 10, specifically, under the column ‘Issue’ and in the ‘Increase in Daily Regional (Transit) Ridership...’, the figures are listed as passengers. Using the term ‘passengers’, any train riders would be counted once for their entrance into, out-of, and back in and out again for their return trips. However, the row ‘Daily BART patronage...’, clearly shows that those figures [are] derived from ‘entrances and exits’. Such figures count the same passengers at least twice, if not 4 times as many as those shown for the expected increase in ridership of other transit systems. This inappropriate comparison shows an inaccurate difference in ridership figures under the Alternative II-TSM column.

Response. Under the heading Transit Ridership of Table ES-2, Comparison of Key Impacts, in the FRDEIR/S#2DEIS, the entry that reads “Increase in Daily Regional Ridership (passengers) compared to No Build in 1998” represents the net change of boardings on BART compared to the No Build Alternative and *not* the number of entrances and exits. Each person boarding a transit system is considered a passenger; the term “passenger” is not used to convey the same individual using the transit system in the afternoon as in the morning. These summary numbers are based on information presented in Table 3.1-2, Alternative VI Aerial Design Option Daily Transit Operator Boardings, in the FRDEIR/S#2DEIS, and Table 3.1-2, Regional Daily Transit Operator Boardings, in the Summary DEIR/SDEIS.

The second row under Transit Ridership of Table ES-2 that states “Daily BART Patronage in San Mateo County in 1998 (entrances and exits)” does not indicate boardings, in that both entrances and exits are measured, as indicated by the text in parentheses. For example, the number “90,000” under Alternative VI Aerial Design Option represents total patronage in San Mateo County in 1998 on BART and not the increase in ridership. Though a patronage number does represent entrances and exits, this number cannot simply be divided in half to represent boardings, when a relatively small segment of the entire transit system is being represented. The portion of the patronage number (e.g., 90,000) in Table ES-2 represents exits where, in most cases, boardings on BART were external to San Mateo County. Only those trips made on BART within San Mateo County could be divided if attempting to convert this number to boardings from the Daily BART Patronage row in Table ES-2. These summary numbers are based on information presented in Table 3.1-3, Alternative VI Aerial Design Option BART Daily Patronage By Station, in the FRDEIR/S#2DEIS, and Table 3.1-7, BART Daily Patronage By Station, in the Summary DEIR/SDEIS. The numbers placed under the TSM Alternative column are the correct patronage estimates for the year 1998.

- 69.2. Additionally, in that same table, (ES-2), the first row under the column ‘Alternative II’ shows a projected increase of only 2100 passengers for the ‘Daily Regional Ridership’ figures. However, the original DEIR contradicts itself by showing on page 2-31, that ‘Caltrain service would be expanded to

86 trains in each direction' (under Alternative II TSM). This would be an increase of 26 trains in each direction, each day.

Response. The first row under the heading Transit Ridership of Table ES-2, Comparison of Key Impacts, in the FRDEIR/S#2DEIS that states "Increase in Daily Regional Ridership (passengers) compared to No Build in 1998" represents the net change of boardings on BART compared to the No Build Alternative. CalTrain service would be expanded to 86 trains per day under the TSM Alternative as well as under the BART build alternatives. Table 3.1-2, Regional Daily Transit Operator Boardings, in the Summary DEIR/SDEIS, indicates that CalTrain ridership under the TSM Alternative would increase by 49,500 boardings compared to the No Build Alternative in 1998.

- 69.3. It therefore looks like about 1 Billion Dollars are expected to be spent on a system that will only have 1.3 to 1.4 times the ridership of an existing system that we could spend only 200 to 250 Million Dollars on...Actual construction figures for the TSM alternative are missing, or at least hard to find, in the DEIR. The figures of 200 to 250 Million are derived from the highest-cost estimates that I have heard to date.

Response. The estimated capital cost of the TSM Alternative is \$247 million in 1995 dollars, according to the Metropolitan Transportation Commission. Please refer to Response 18.7 for further information regarding TSM cost estimates.

70. WARD, LYN

- 70.1. Statements have been made that BART would be "underground or in a subway" to just south of Angus Avenue....Belle Air cannot accept this idea. We prefer the bored tunnel.

Response. The commentor's support for the BART-San Francisco Airport Extension with a bored tunnel configuration through the City of San Bruno is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Response 24.1 of this FEIR/FEIS for discussion of bored tunnel construction through San Bruno under Alternative VI, which was found to be infeasible due to a number of unmitigable impacts.

- 70.2. We are concerned that the utmost safety and comfort of the school be maintained. Of the construction laydown areas suggested,...we request Alternative B, with no traffic routed along 1st Avenue. Move alternative B south and use the PG&E dirt roads and access to Highway 101.

Response. Please refer to Responses 8.31 for a discussion of contractor laydown areas and haul routes in the Belle Air neighborhood.

- 70.3. Protect the school and 7th Avenue homes with a temporary sound barrier. A temporary sound barrier along 1st Avenue during construction is also necessary.

Response. Where construction noise levels from trucks and other equipment would exceed the noise limits indicated in the DEIR/Technical Appendix (see Tables 3.13-11 and 3.13-12), mitigation to reduce noise levels would be used. Examples of possible noise mitigations are indicated on page 3.13-161 of the DEIR/Technical Appendix. Temporary noise barriers, where necessary, are one form of mitigation. It is assumed that the school referred to by the commentor is Belle Air Elementary School. Please refer to Response 11.1 for a further discussion of noise impacts and mitigation at this school.

The impact of construction noise to residents along 7th Avenue would primarily be associated with activity at construction yard alternative B. The construction contractor's noise mitigation plan would

indicate what forms of noise control were to be used to meet the noise limits referenced above. A temporary sound wall around the residence side of the construction yard might be one form of mitigation, if found to be necessary. Such mitigation would also be considered for yard alternatives A and C. If 1st Avenue were to be used as a haul route, a temporary sound wall would be constructed to shield the homes. The referenced noise limits would be imposed on the contractors by BART and would be monitored by an environmental compliance monitor during construction.

- 70.4 We are concerned about spillover parking on our streets. We have very little street parking for ourselves. Please provide a parking area elsewhere.

Response. Please refer to Response 6.26 for a discussion of spillover parking.

- 70.5 Removal of a "a few trees" is mentioned in connection with construction laydown Alternative B. Why do you persist in thinking that few trees, houses, businesses, whatever, do not matter? If the quantity is a few, preservation must be possible.

Response. The term "few trees" was used to describe a quantity and was not meant to define the importance of the trees. BART recognizes the importance of all property altered by project construction. Every effort will be made to ensure that no trees are unnecessarily removed in connection with the contractor's operations at the laydown area. Removing trees is only necessary when they are in operating locations, and then removal is a matter of public and operational safety.

- 70.6 Belle Aire does not want the school, park and community gardens disturbed. Relocate the wetlands elsewhere and exert all effort possible to eliminate disruption of this area.

Response. Please refer to Response 8.19 for information regarding creation of wetlands near Belle Air Elementary School.

- 70.7 The current document states the traction power and train control structures will be constructed on the site of the present CalTrain station. These structures will be screened from homes on Huntington Avenue. What about 1st Avenue and Lion's Field? We request these structures be located in an area farther south.

Response. Please refer to Responses 8.12 and 11.6 for a discussion of visual impacts associated with the traction power and train control structures.

- 70.8 Where will the CalTrain station be during and after construction?...Belle Aire wants assurance that the train station will be relocated to its present site at the completion of construction...

Response. Please refer to Responses 8.1 and 9.2 concerning the temporary relocation of the San Bruno CalTrain Station that would move it under I-380 during construction. During preliminary engineering, detailed construction planning will minimize the impact of temporary movement of this station and associated parking areas. This planning will be reviewed in cooperation with CalTrain and the City of San Bruno. After construction, the San Bruno CalTrain Station will be relocated back to its present location.

- 70.9 During and after construction, we need safe access by foot to the school and to downtown for our children, neighbors and elderly. We also need access to the park, community gardens and 4H buildings.

Response. Safe pedestrian access would be provided across the CalTrain tracks in the vicinity of Angus Avenue in San Bruno during construction of the BART extension. After construction, the BART alignment would be underground, in accordance with the Aerial Design Option Locally Preferred Alternative (LPA), and pedestrian access across the CalTrain tracks would be the same as

before construction. Please refer to Response 24.4 for further discussion of access across Angus Avenue during construction.

- 70.10. The Angus crossing of the right of way is dangerous and confusing. Some attempt has been made to make a smooth intersection at Huntington, but at 1st Avenue the SDEIR shows the same awkward and inefficient connection...

Response. Please refer to Response 8.8 for a discussion of the realignment of Angus Avenue as part of the BART–San Francisco Airport Extension. The condition described in this comment would not be adversely affected by the BART extension.

- 70.11. Forty five months of BART construction noise will be a long time! Two actions should be taken: provide...temporary sound barriers...during construction; and adhere to the California codes pertaining to environmental quality to provide adequate sound wall protection or housing insulation after construction.

Response. Though construction of the proposed BART extension will extend over a long period, significant construction in any one area of the alignment would typically be limited to 12 to 18 months. To reduce the impacts from noise, BART would impose noise limits which are in accordance with local city noise limits for construction. Operational noise impacts have been addressed and mitigation would be implemented, as required.

- 70.12. Nowhere can we find any discussion in the recirculated DEIR of wet season impacts upon the Belle Aire Neighborhood. In years of normal rainfall the water rises 4 - 6 inches above the surface around many homes and remains for several days. We believe further study is necessary on whether the changes, relocations, and construction activity will improve or worsen this condition, perhaps permanently.

Response. During construction, the drainage volumes and flows would be maintained. Therefore, minimal impact would be placed on upstream properties, such as the Belle Air Neighborhood. In addition, any new drainage facilities constructed will be consistent with 100-year flood design criteria. Please refer also to Response 12.11 for a discussion of stormwater drainage mitigation.

- 70.13. BART and SamTrans have already requested bicycle paths along the alignment linking Tanforan, the Fifth Addition, Lion's Field, Belle Aire school and Millbrae. We would appreciate the addition to this amenity.

Response. Please refer to Response S44.4 for a discussion of this issue. A general description of a proposed bike path utilizing BART right-of-way has been conducted and the results are presented in Volumes I and II of this FEIR/FEIS.

71. WARNER, JUDY

- 71.1. I am waiting for BART to come to the area. I look forward to using BART.

Response. The commentor's support for the BART–San Francisco Airport Extension is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

- 72.1 Passengers headed for or coming from the other terminals still have a long way from or to the BART station. The Subject Report does not provide any information about the ALRS....Nothing is said whether private cars and shuttles still can drop passengers at the check-in counters and pick them up at the baggage carousels. If yes is the answer, the ALRS travelers would have to cross a busy road or use many escalators to reach safe crossovers to or from the transfer place from shuttles and taxis to the ALRS and driver of private cars must park in the garage before dropping passengers and luggage at the curbs in front of the check-in counters?

Response. The Airport Light Rail System (ALRS) is an SFIA project. The ALRS is conceptually described in Section 2.2 under the TSM Alternative in the DEIR/Technical Appendix. The interface of BART and the SFIA Master Plan projects, including the ALRS, is shown in Figure 2-4 of the DEIR/S#2DEIS and in the Design Appendix, pages 5, 12 and 13. The ALRS is presently under design by the airport. An artist's rendering of the ALRS, in Figure 2.2-11 of the DEIR/Technical Appendix, shows the ALRS inside the loop roads at the airport. ALRS passengers would need to cross the loop road in order to access the terminals.

- 72.2. The figures on future daily patronage are pure fantasy, so are the "exact" figures of the cost of schemes B and X. I dealt with those items in my comments on the DEIR, dated February 25, 1995.

Response. The estimates of daily transit patronage for each transit system analyzed are based on the regionally approved Metropolitan Transportation Commission (MTC) travel demand model as required by the Federal Transit Administration (FTA). Please refer to Response 16.3 for a discussion of the level of detail of the cost estimates typically provided in an environmental document.

- 72.3. Following is a description of a "conceptual" Intermodal Station: About 2500 feet long, located anywhere between STA 382+00 and STA 413+00, east of the sound wall. Alignment: BART station north of CalTrain station. All trains arriving from or heading North or South will stop west of an $20 \pm$ ft wide platform, level all along its length. Such an arrangement is based on an array of switches and crossings. Passengers cross the platform and board shuttles, running on a depressed $20 \pm$ ft wide runway. Shuttles can use existing and new ramps to and from the Airport and will run counterclockwise, following the present traffic arrangement around the existing center garage. The capital maintenance and operation cost of such a station will be several \$100 million less than the cost of either Option B or X. The departing passengers need only two transfers, from the BART train to the shuttle and from the shuttle to the check-in counter, or an appropriate arrangement for the arriving passengers.

Response. The commentor is proposing an at-grade BART/CalTrain/Shuttle Bus station, west of Highway 101 across from the airport access roads, with BART and CalTrain linked to the airport by a shuttle (similar to the Oakland AirBART arrangement). The shuttle bus would operate on a depressed roadway under the west of Bayshore property and under Highway 101 and then rise to meet the existing or new airport road system at the SFIA. The commentor also proposes that all trains both northbound and southbound stop west of the platform, with direct access to the airport shuttle bus. The BART platform would be north of the CalTrain platform. Functionally, this is similar to the 1992 Locally Preferred Alternative (LPA) Airport BART/CalTrain/ALRS Intermodal Station west of Highway 101, except an aerial ALRS connected the intermodal station to the airport terminal instead of a shuttle bus.

Operationally, with both northbound and southbound BART trains occupying the same platform to the west, it would be difficult to maintain proposed peak-period headways, without conflicts, between the northbound and southbound trains. For example, with one platform to the east, a northbound train would need to hold south of the station until a southbound train cleared the platform. It would be difficult if not impossible to avoid these conflicts between northbound and southbound trains between

the East and West Bay. This reduces operational flexibility and does not meet the operational needs of BART or CalTrain.

In addition, because of BART's electric third rail, BART and CalTrain tracks cannot cross each other without a grade separation. Crossing BART and CalTrain at the same grade violates BART's design criteria and thus is not feasible.

3.6 SPEAKERS

S1. ALLEN, ROBERT

- S1.1. I certainly would urge that BART to the San Francisco airport include these elements. The line from Colma to San Bruno be at grade. The line from I-380 through Millbrae be west of CalTrain. CalTrain and BART share a common grade south of I 380. That all streets cross on overpass or in underpasses. That the south leg of the Y from Millbrae into SFO be eliminated. And that CalTrain and SFO transfers occur in San Bruno, not in Millbrae.

Mr. Allen's oral comments are the same as his written comments. Please refer to Responses to Comment Letter 29.

S2. AMSTRUP, IRV

- S2.1. I haven't heard a word said about the street that I happened to live on, which is Trousdale. It goes from 280 down to 101, and it stops at El Camino. We have schools on both sides of the street, medical buildings, and a hospital. Think what is going to happen to us when BART goes in down at the bottom of the hill, especially with their maintenance yard next to the Burlingame Village.

Response. Please refer to Response 7.6 for a discussion of traffic impacts on Trousdale Drive.

- S2.2. We are worrying about one snake, and there's a whole stand of eucalyptus trees where you are going to now park BART trains in Burlingame. What's more important, beautiful eucalyptus trees or a snake?

Response. The San Francisco garter snake is a federally listed endangered species under the Endangered Species Act and is afforded protection under this act. Eucalyptus trees are fast-growing, non-native trees that provide little to no habitat for the species identified as sensitive on this site, and are not protected by any regulatory/resource agency. While eucalyptus trees may be a visual amenity, from a biological perspective they offer relatively low habitat value.

S3. BARTALINI, JACK

- S3.1. There is very little benefit for San Mateo County with the BART systems. This is mostly a San Francisco project, and the people of San Mateo County are going to have to share all the pain and they're going to have to financially support it.

Response. The commentator's opposition to the BART-SFIA Extension is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the Locally Preferred Alternative (LPA). Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Section 1.3 of the Summary DEIR/SDEIS, which explains the need for the project, and to Responses 23.10, 32.72, and S11.1 of this volume of the FEIR/FEIS for further reasons why the project would serve San Mateo County.

- S3.2. We already started to cut our SamTrans bus routes in this county. We shouldn't be cutting out these bus routes, we should be adding bus routes in San Mateo County. We have already started, as of the other day, to increase local bus fares. People who want to take a SamTrans bus are going to have to pay through the nose now.

Response. Please refer to Response 6.14 for a discussion of SamTrans bus routes with implementation of the BART extension, and to Response 6.67 regarding SamTrans' ability to financially support the project and maintain bus service.

- S3.3. If BART is built...fares originating in those counties on BART will be paying a surcharge. In other words, people living here in San Mateo County getting on that train to go anyplace are going to have to pay more than people in other counties.

Response. BART currently charges a \$0.60 surcharge at the BART Daly City Station. Per the Comprehensive Agreement pertaining to the BART system extension (March 1, 1990), BART would establish a basic fare structure consistent with the fare structure throughout the BART system, and SamTrans could establish a fare surcharge except at the southernmost station on the BART extension.

S4. BERNARD, KATHLEEN

- S4.1. I would like to say that I am disappointed that Alternative II is not laid out on Page E-3 of this report that is being distributed tonight.

Response. Alternative II is not included in Table ES-1, Summary of BART Build Alternatives, on page ES-3 of the FRDEIR/S#2DEIS because the table compares the key features of the Aerial Design Option to other BART build alternatives. Alternative II (TSM) is included in Table 6-7, Cost Effectiveness Index, which uses Alternative II as a base from which the cost effectiveness of all other project alternatives are compared. In addition, Table ES-2 in the FRDEIR/S#2DEIS compares Alternative II with each of the BART build alternatives for each of the environmental issues analyzed.

- S4.2. I am disappointed that BART has misinformed the FTA in stating outright that there was not local opposition to BART. Any person in any one of these meetings knows that is outright deceit.

Response. As noted on page 1-2 of the FRDEIR/S#2DEIS, one of the reasons that Alternative VI was selected as the LPA is that Alternative VI received the greatest community support. This is not intended to imply that there is not opposition by individual members of the affected communities. The commentator's opposition to the proposed project is noted.

- S4.3. BART doesn't need to go any further than Colma....In a House Senate conference report...significant unresolved issues must be resolved before long-term financial commitment can made to this project....Conferees believe that sufficient time to complete and renew adequately the supplemental draft environmental impact statement and the subsequent engineering and financial plans and final environmental impact statement is not available in fiscal year 1996.

Response. The residents of San Mateo County have supported the idea of a BART extension south of the Colma Station a number of times (please refer to Responses 23.2, 23.10, and S11.1). Please refer to Response 32.51 for a discussion of the House-Senate Conference Committee language.

S5. BISSON-BARNES, ALICE

- S5.1 Ms. Bisson-Barnes' oral comments are the same as her written comments. Please refer to Responses to Comment Letter 35.

S6. BRACKER, JESSE

- S6.1 Ms. Bracker's oral comments are the same as her written comments. Please refer to Responses to Comment Letter 36.

S7. BRUN, GOTTFRIED

- S7.1 In order to make this system to be used most efficiently, it has to lead from downtown San Francisco using the shortest route direct into the San Francisco airport loop, as shown in Figure 2B, with a future extension to San Jose. Stations at all adjacent shopping malls or business centers should be provided. The transfer station to the present BART system should be in downtown San Francisco, not in Daly City.

Response. Please refer to Response 37.3 for a discussion of an a light rail transit system serving San Francisco, SFIA, and San Jose.

- S7.2 If the present plan should be, or the present project should be reviewed, I would strongly advise to use the BART interface with the San Francisco Airport in the master plan with option X station.

Response. The commentor's support for Alternative VI Aerial Design Option X is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.1 for the recommended station location at the Airport International Terminal.

S8. BRUCE, PATRICIA

- S8.1 We have formed our own organization and we, as an organization, stand behind stopping BART at Colma.

Response. The commentor's opposition to the BART-San Francisco Airport Extension is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Section 1.3 of the DEIR/SDEIS, which explains the need for the project, and to Response 23.2 of this FEIR/FEIS for an explanation of the need for a rail transit project south of Colma.

- S8.2 I don't understand why, if we are talking about cooperation, mass transit for our total community, that we don't have a representative component [from SamTrans and CalTrain] that represents the whole community. We are always going to BART hearings, constantly, forever.

Response. BART and SamTrans are the co-lead agencies under the California Environmental Quality Act (CEQA). The Federal Transit Administration (FTA) is the lead agency under the National Environmental Policy Act (NEPA). BART and SamTrans are the local agencies with authority to approve the BART extension project.

S9. BUSCHMAN, SCOTT

- S9.1 To date, there is not one mention of cost or construction methods, not any mention at all in the hundreds of pages of documents of bored tunnel. So, if this is not put in the final EIR, if this becomes a red herring, then the last of the support that BART has from our city will be withdrawn.

Response. Please refer to Response 24.1 for a discussion of costs associated with a bored tunnel segment through San Bruno.

S10. CAPODAMMO, DAN

- S10.1 I support Millbrae's primary decision that BART not enter or disrupt the City of Millbrae.

Response. The commentor's opposition to construction of any part of the BART alignment in the City of Millbrae is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA, and to Response 26.6 for a discussion why a Millbrae Avenue Station is desirable.

- S10.2 I support the County of San Mateo grand jury's recommendation that the County of San Mateo not financially support the intrusion of BART into San Mateo County.

Response. Please refer to Response 32.72 for a discussion of the grand jury report.

- S10.3 I support Millbrae's opposition to any at-grade alignment through the City in the existing corridor. I oppose, however, the inclusion of any assessment of the impacts as requested by the City of Millbrae which might occur if this system were built at grade through Millbrae, because building the system at grade is totally unacceptable from a residential point of view.

Response. The commentor's opposition to an at-grade segment in Millbrae is acknowledged. Please refer to Response 7.2 for a discussion of Millbrae's request for an at-grade assessment.

S11. CARTER, JEFF

- S11.1 We can save an additional amount of money by deleting the SFO to Millbrae segment of this project, because by getting near the terminal as an Option X or Option B, we are near the airport. Going out to Millbrae is in violation of Measure K, which is what San Mateo County voters approved.

Response. Please refer to Response 36.5 for a discussion of a spur line into the airport.

In November 1985, the electorate of San Mateo County approved ballot Measure A by a 73 percent vote. Measure A authorized SamTrans to fund the construction of a passenger station in unincorporated Colma and to contract with BART for the extension of service to this facility. The vote was a strong affirmation of the public's concern over the area's transportation problems, including limited access to the Daly City BART Station and increasing commuter traffic.

In November 1987, San Mateo County voters approved Measure K, which provides for the use of SamTrans funds for a BART extension beyond Colma to the San Francisco Airport, by 61.6 percent. This represents strong voter approval for the BART-San Francisco Airport Extension in general. The measure read, "Shall the San Mateo County Transit District be authorized to construct BART passenger stations and related facilities south of the proposed Colma Station and at a location near the San Francisco Airport?" The impartial analysis of Measure K in the voters' pamphlet by the District Attorney stated that "the measure does not specify the exact locations of the proposed passenger stations and related facilities." Hence, an extension farther south is not a violation of Measure K. The voters' pamphlet argument in favor of Measure K, however, indicated that the proposed extension would follow the Southern Pacific San Bruno branch right-of-way and include passenger stations at Chestnut Avenue, near the Tanforan Shopping Center, and an airport external station. It also stated that "this alignment would not impact any homes or commercial properties."

As further testimony of support for a BART extension, San Mateo County, in 1992, showed support for a BART extension to San Francisco Airport by passing Measure B, an advisory vote, by 75 percent.

Since the 1987 elections, new information, evaluation of new alternatives, and environmental analysis have been conducted. Since the November 1987 election, an AA/DEIS/DEIR, DEIR/SDEIS, and FRDEIR/S#2DEIS have been prepared, with new alternatives and cost estimates for the BART–San Francisco Airport Extension. The scoping and screening process for selection of alternatives studied in the DEIR/SDEIS, including those with a station in Millbrae, are documented in Section 2.5, Alternatives Selection Process, in the DEIR/Technical Appendix. Following a lengthy community participation process, Daly City, Colma, South San Francisco, San Bruno, and Millbrae have registered support of Alternative VI, with conditions. Alternative VI and its Aerial Design Option LPA both include a BART/CalTrain intermodal station at Millbrae Avenue.

The Aerial Design Option LPA has the benefit of a Millbrae Avenue Station, serving both the local Millbrae/Burlingame catchment area and commuters from the south via Highway 101, and provides stations at Tanforan and Hickey between Highway 101 and I-280 near the center of mass in the Cities of San Bruno and South San Francisco. The Tanforan Station, located near I-380, has the benefit of providing an alternative station for commuters from either Highway 101 or I-280.

- S11.2. We need to improve CalTrain, as many people have said before. In most other metropolitan areas, systems like CalTrain and BART, they compliment each other. They work together. That is what we need to do here. I don't know why they seem to think that we should have one or the other. We need to have both systems complementing each other on the Peninsula.

Response. The commentor's support for both the BART–SFIA Extension and an upgrade to CalTrain is noted. Please refer to Response 10.3 for a discussion of the selected LPA and the implications of the BART project for future CalTrain service and improvements.

S12. CHURCH, MARK

- S12.1. It is absolutely imperative that all traffic, noise and vibration impacts be mitigated and that BART provide full funding to do so.

Response. Noise impacts, including any in Millbrae, are addressed in Section 3.9.2, Noise and Vibration Impact Assessment and Mitigation, of the FRDEIR/S#2DEIS. Traffic impacts are addressed in Section 3.1.3, Traffic Impact Assessment and Mitigation, of the FRDEIR/S#2DEIS. Please note that these issues are also addressed in Chapter 3 of the Summary DEIR/SDEIS for the other alternatives examined. There would be no unavoidable site-specific noise or vibration impacts under the Aerial Design Option LPA. Please refer to Response 6.24 for a discussion of improved traffic conditions under the Aerial Design Option and the mitigation of significant traffic impacts.

- S12.2. I concur with the city's request that BART provide a fire and rescue substation near the BART site, with appropriate equipment and personnel properly trained to deal with tunnel fires and other hazards which may arise. I also submit that BART should provide funding for an additional police substation near the BART site to deal with additional crime that most likely will occur and also to assist in accident investigations.

Response. Please refer to Response 7.16 regarding the need for a police substation at the Millbrae Avenue Station.

- S12.3. I would submit that the Millbrae police department must be given full access on to BART premises to conduct investigations and make arrests, whenever it deems appropriate, with the full cooperation of BART. BART should provide the funding for these additional burdens which will be placed on our police department.

Response. The Millbrae Police Department would be given full access to BART premises to conduct investigations and make arrests under the California Mutual Aid Agreement (CMAA). The agreement is described in Section 3.5, Community Services and Facilities, of the DEIR/Technical Appendix. This agreement is signed by BART and all local jurisdictions served by BART. The CMAA is an existing protocol whereby the local jurisdictions and BART agree to provide mutual police services should the need arise. Since the agreement is mutual, BART and each agency provide their own funding.

Based on conversations with other jurisdictions with BART service, emergency response demands have been satisfied with existing resources. Circumstances at each jurisdiction may vary, however, and there is some uncertainty as to whether additional resources would be required to meet the increased demand for services. Any major new development, such as a shopping center, university, or theme park, results in important benefits to a city, and some additional costs for police and fire services.

S13. COOK, THERESA

- S13.1. ...From Angus on to Millbrae, we want bore tunneling, tunneling, nothing open, and no aerial construction. Therefore, there would not be a need for a 14-foot sound wall....

Response. The commentor's support of bore tunneling is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Response 24.1 offers reasons why a bored tunnel segment through San Bruno is considered infeasible.

S14. CRICHTON, KYLE

- S14.1. BART LPA with aerial design option, I am definitely in favor of it. It's too bad we can't have a bored tunnel, but let's be realistic....

Response. The commentor's support for the Aerial Design Option is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

- S14.2. I don't own either home on Aviator that is going to be sacrificed, but I would like to suggest we extend Roblar Avenue 50 to 100 feet and move those homes on Hemlock and Aviator to that site.

Response. Homes on Aviator Avenue and Hemlock Street for the Hillcrest underpass would be acquired in accordance with federal and state acquisition/relocation laws. In accordance with current guidelines and laws, once the homes are purchased by BART/SamTrans, the homes may be disposed of or purchased at salvage value. If the home(s) were relocated to a suitable developed site, the cost for relocation of the structure and site development costs would not be borne by the project.

- S14.3. I would also suggest that we examine sound walls. In view of the experience they have had in Mountain View and elsewhere along Bayshore, where the sound was bounced in the neighborhoods that previously had no noise. I think sound walls are also graffiti magnets.

Response. Caltrans has demonstrated, through extensive studies, that sound walls do not increase noise, contrary to claims reported in newspaper stories over the last couple of years.

Sound walls and retaining walls inside the BART right-of-way would be protected by a cyclone fence with a barbed-wire extension. The district has a "zero-tolerance" philosophy toward graffiti, as ignoring the problem or delaying removal only encourages more graffiti. An important part of the design of system facilities includes graffiti-resistant wall finishes and the application of paint that

assists in removing graffiti. When warranted, the BART Police Department monitors graffiti activity through active undercover surveillance and takes appropriate action.

Sound walls and retaining walls fronting onto public accessways are maintained under a similar program to that described above. If BART employees or the public report incidences of graffiti, a crew is dispatched to remove the graffiti.

- S14.4. I would also hope we adopt the Millbrae station design option. It will give much better traffic flow. And, for God sakes, when we do build this thing, let's make sure Bayside Manor has access from Hillcrest.

Response. The Aerial Design Option LPA incorporates many of the city's recommendations for the Millbrae Avenue Station, as Described in Volume I of this FEIR/FEIS. The proposed alignment north of the Millbrae Avenue Station would provide for a new underpass connecting El Camino Real with the Bayside Manor neighborhood at Hillcrest.

S15. DITTMER, DEBBIE

- S15.1. I would like anyone in this room to examine the probability that it is more intelligent to connect something between Daly City and the San Francisco Airport than to connect something from CalTrain to the airport and to make a small connection from CalTrain in San Francisco to a BART station there. I don't think that is something that requires a lot of thought on the part of anyone here to recognize that mileage-wise the distance there is going to be much, much shorter and the savings to taxpayers would be tremendous.

Response. Public input regarding the merits of different alternatives was considered by the BART and SamTrans boards in selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Chapter 2, Volume I of the FEIR/FEIS, which explains why BART is pursuing an aerial alignment into the SFIA.

S16. FOGARTY, JANET

- S16.1. The significant impacts on Millbrae [Avenue] caused by this BART project, one, must be fully mitigated, two, must be mitigated concurrently with the construction of the project, and, three, the region's transportation solutions must be fully funded by the region's project.

Response. Please refer to Response 6.24 for a discussion of the mitigation of significant traffic impacts under the Aerial Design Option, and to Responses 7.4 through 7.7 for a discussion of traffic improvements to be made concurrently with the BART extension. The project sponsors would assist others in completing improvements at the Millbrae Avenue interchange and the intersection of El Camino Real and Millbrae Avenue before the opening of the BART extension. The BART-SFIA project sponsors are committed to making appropriate financial contributions toward these two roadway improvement projects, although the BART extension project sponsors would not have jurisdiction over the design and implementation for either of these roadway improvement projects.

- S16.2. Millbrae's concurrence and cooperation with this project is contingent upon BART and SamTrans agreeing in an executed mitigation agreement with Millbrae to fully mitigate the impacts of the project and to fully fund the mitigation measures concurrent with the project's construction.

Response. Please refer to Response 6.77 for a discussion of BART's commitment to mitigating significant impacts and to the Mitigation Monitoring Plan. Please refer also to Response 7.4 regarding impacts and mitigation measures at the El Camino Real/Millbrae Avenue intersection.

S17. HARGRAVE, ANTHONY

- S17.1 [Regarding] the noise pollution I keep hearing about. If you lived in this county for any time, you witness noise pollution as far as airplanes. I grew up watching airplanes over my head. So, as far as the noise, come on, give me a break.

Response. The California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) require that all contributions to cumulative impacts be recognized. The environmental impact analysis for the BART project has assessed cumulative noise impacts from all sources and identifies mitigation for BART-generated significant noise impacts.

- S17.2. I am a Garden Lane resident. I do not appreciate the fact that we are always referred to as lower income, second class, or whatever have you. I do not appreciate the fact that we do not have in our mailboxes or we do not know nothing about this. And you guys are holding the balance of our life in your hands? I mean, what are going to do? All I want to know is what's going on with the project.

Response. The President's Executive Order No. 12898 and the Department of Transportation mandate that federally supported activities, such as the proposed BART extension, assess the possible impacts of such activities on "minority" and "low-income" populations. The DEIR/SDEIS and FRDEIR/S#2DEIS have followed U.S. Census Bureau data in identifying such populations. Contrary to the implications of this comment, there is no intent, in the federal guidance or otherwise, to consider high-minority or low-income populations as "second class." Indeed, the federal guidance is designed to ensure that programs, policies, and activities identify and address, as appropriate, disproportionately high impacts on such populations. See Chapter 7 of the Summary DEIR/SDEIS and FRDEIR/S#2DEIS.

Please also refer to Response 2.19 for a discussion of community participation.

S18. HARRIMAN, TOM

- S18.1. SamTrans is running at full bicycle capacity, and with restrictions on the bicycle access on BART during commuter hours, Peninsula bicycle commuters are much better served by CalTrain....Will the proposed light rail system allow bicycles on board? Doing so will make the system much more accessible to both airport passengers and the airport employees....Cyclists will be transferring with bikes from CalTrain to BART. BART must be ready to reconsider allowing bikes on to the BART system during commuter hours if construction will be disrupting service by CalTrain into San Francisco.

Response. The SFIA plans for the Airport Light Rail System (ALRS) are conceptual and not finalized at this time. Neither SamTrans nor BART has considered whether bicycles would be accommodated on the ALRS. This question should appropriately be directed to the SFIA, which will own and operate the ALRS.

The construction of BART will not preclude CalTrain service into San Francisco, although there may be some adjustments to train departure times for single-tracking CalTrain through downtown San Bruno.

S19. HENDRICKSON, RAY

- S19.1. The new BART plan will annually cost the [Millbrae School] district approximately \$784,000 over the next five years following the initial construction....In all probably, due to the loss of income, the state will recommend the immediate closure of one more K-5 school. In all probability, that school will be Lomita Park....The district will be required to expend large amounts of money for the moving of

portable buildings on to the remaining school sites. The district does not have the financial viability, nor can it expect to have this amount of money.

Response. These comments are similar to those received on the January 1995 DEIR/SDEIS. Please refer to Responses to Comment Letter 21 in Volume II of this FEIR/FEIS. In addition, the commentor may also refer to Response 6.40 for a brief discussion of the project effects on the Millbrae School District.

- S19.2. BART's extension has stated that the atmospheric conditions within the building from BART train fumes and also the JP fuel fumes at a closed site such as Lomita Park will cause environmental impact.

Response. Adverse air quality impacts would not occur within the Lomita Park Elementary School as a result of "BART train fumes." BART trains are electric and do not emit exhaust gases. No significant effect on ambient pollutant concentrations would occur at the Lomita Park Elementary School as a result of BART operations under the Aerial Design Option LPA.

- S19.3. BART has made no contact with the district on the proposed extension. It should be noted that the district is an agency of the State of California and therefore the state may take action relative to the BART project based upon the findings of the school facilities division's investigation and final report....The district is requesting mitigation negotiations immediately on behalf of the school and the school community.

Response. BART is always willing to meet and discuss elements of the project with appropriate public agencies and to discuss suitable mitigation for environmental impacts.

S20. HILLS, ERNIE

- S20.1. Prop K, November of 1987, said to build a location near the airport....The leg beyond the airport, as far as the vote concerned, was not included in the authorization.

Response. Please refer to Response S11.1 for a discussion of Measure K.

- S20.2. You can go from California Avenue to Fourth and Townsend in 40 minutes. Six more minutes with the extension can put the people at Montgomery. BART will have 16 station stops to California Avenue, one hour and five minutes. You're looking at two hours and 20 minutes more per day for a person to go through San Mateo County. How many of the people are going to do that?

Response. Please refer to Response 6.11 for a discussion of CalTrain and BART travel times to downtown San Francisco.

- S20.3. We must look at CalTrain beyond the airport, and, in the airport, build first an exterior station for the transfer, and then the tail track of the extension to go into the location of the interior station, and then let other funds wrap a station around that track, including FAA funds, which are available.

Response. The commentor is proposing an airport CalTrain/ALRS exterior station west of Highway 101 and then a CalTrain "tailtrack" spur line into an interior airport CalTrain station, paid for with Federal Aviation Administration (FAA) funds. The capital costs would be extraordinary, and the proposal is financially infeasible. The BART Alternative VI tunnel alignment and station on airport property with, 22-foot-diameter double-bore twin tunnels and a 700-foot cut-and-cover station at the proposed Airport International Terminal, has an estimated capital cost of \$371 million. A CalTrain subway alignment into the airport and cut-and-cover station would also be expensive because it requires 35-foot-diameter double-bore twin tunnels, electrification of CalTrain, and a 1,000-foot-long platform compared to a 700-foot-long BART platform. Providing a CalTrain tunnel alignment to the

International Terminal would have significantly higher capital costs and is financially infeasible. In addition, a CalTrain-only spur into the airport would not provide a linkage with the BART system.

S21. HONS, EMILE

- S21.1 I am here tonight to again emphasize our absolute commitment to Alternative VI and to Tanforan station.

Response. The commentor's support for Alternative VI and the Tanforan Station is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

S22. IRWIN, JEROME

- S22.1. Can you clarify from your perspective what exactly is the current status of the San Francisco garter snake as regards the proposed extension? When was the last biological study conducted in the SFO area on the snake? And what are the findings? Has it already been extirpated or in danger of becoming so?

- S22.1. **Response.** Mr. Irwin's oral comments are the same as his written comments. Please refer to Responses to Comment Letter 50.

S23. JACOBBERGER, JACQUELINE

- S23.1. For transportation, we have concerns about the ridership predictions, project-related congestion on the freeways, interchanges, local streets, and intersections.

Response. The estimates of daily transit patronage for each transit system analyzed are based on the regionally approved Metropolitan Transportation Commission (MTC) travel demand model, as required by the Federal Transit Administration (FTA). Traffic impacts under the Aerial Design Option LPA are addressed in Section 3.1.3, Traffic Impact Assessment and Mitigation, of the FRDEIR/S#2DEIS. Please note that these issues are also addressed in Chapter 3 of the DEIR/SDEIS for the other alternatives examined. Please refer to Response 6.24 for a discussion of improved traffic conditions under the Aerial Design Option and the mitigation of significant traffic impacts.

- S23.2. For biological resources, we have concerns about the impacts on wetlands and mitigations creating substitute habitats.

Response. Please refer to Response 6.77 regarding mitigation requirements, and refer also to Responses 12.15, 16.33, and 16.34 for a discussion of wetland mitigation measures.

- S23.3. [We have concerns about] the identification of funding uncertainties, cost effectiveness index calculations, failure to take into account the impacts of CalTrain downtown extension in certain calculations, the need for further consideration of SamTran's financial capacity to deliver its commitments to SamTrans and CalTrain services.

Response. Please refer to Response 16.16 for a discussion of funding for the project, and Response 6.76 for a discussion of cost effectiveness index calculations, and Response 6.8 for a discussion of the proposed CalTrain downtown extension.

Please refer also to Response 6.67 for a discussion of SamTrans' capacity to support the project.

S24.4. It may be necessary to decide that financial considerations require an extension of BART only to the point where an intermodal connection of BART, CalTrain, and the airport light rail system can be most effectively made and that a truly regional transit network could be better enhanced by the upgrade, extension, and electrification of the already existing CalTrain service. This will require us to wait for completion of the CalTrain DEIR study.

Response. Please refer to Response 4.9 regarding the CalTrain-ALRS connectivity study and Response 6.8 regarding the CalTrain extension to downtown San Francisco. Response 23.10 provides a rationale for proceeding with both the BART and CalTrain projects. Please also refer to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

S24. JOHNSTON, BOB

S24.1. I...see the 1500 feet of track and I figure that is the end of it. As I start talking to people and listening to Marti Knight, it seems like there are additional parking lots that aren't on the charts. There is going to be a pit for minor repair area, 60 cars, where they are going to park cars, that they have added to the environmental report that aren't on the charts up here. And I guess what I am doing more than anything else is just trying to make a statement to BART that I am really disappointed in their underhanded dishonesty and hiding of the facts from the charts.

Response. The one-car emergency inspection pit is described on page 2-17 of the FRDEIR/S#2DEIS. For a description of the activities to be performed in the tailtrack area, please refer to Response 6.58.

S25. KELLY, JIM

S25.1. The environmental analysis of air quality impacts makes no mention whatsoever of the elevated levels of local air pollution the proposed extension would introduce that would come from the 4,000 additional cars moving through San Bruno, Millbrae, and Burlingame en route to and from BART parking.

Response. Local carbon monoxide (CO) impacts near roadway intersections in San Bruno, Millbrae, and Burlingame are evaluated in Section 3.10 of the DEIR/Technical Appendix. The analysis of local CO impacts at roadway intersections is based on traffic volumes calculated by a subarea traffic model. This local traffic model assigns Metropolitan Transportation Commission (MTC) regional traffic forecasts to the local transportation network and allocates individual vehicle trips to the proposed BART stations. In other words, predicted vehicular traffic volumes and associated CO emissions at roadway intersections in San Bruno, Millbrae, and Burlingame incorporate the vehicle trips attracted to the proposed BART stations.

S25.2. For the proposed sound wall through much of San Bruno and Millbrae, I cannot comprehend how the report can conclude that it would be anything but an environmental and economic disaster. Those residential areas enjoy a green belt envied by other neighborhoods. The greenery dampens present train noise as no wall could. To replace it with artificial masonry would be unconscionable. The report must take into account the lowering of property values from the walls, visual pollution, and from reflecting and intensifying traffic noise along adjoining streets.

Response. The sound walls would be landscaped for aesthetic reasons. Please refer to Responses 50.4 and 53.10 for further discussion of the aesthetics of sound walls and the loss of the greenbelt, respectively. Given these treatments to the proposed sound wall, lower property values would not be expected in San Bruno or Millbrae. Caltrans has demonstrated, through extensive studies, that sound walls do not increase noise, contrary to claims reported in newspaper stories over the last couple of years. It is a common misconception that a few trees can provide an effective noise barrier. Studies have shown that it takes a forest of trees at least 100 feet deep to produce more than an insignificant reduction in sound.

- S25.3 The same neighbors bordering that monstrous sound wall would have no benefit from BART as transit, not without getting out of the car and driving to Millbrae or Tanforan station, the very thing transit is supposed to replace.

Response. As described in Section 3.9, Noise and Vibration, in the FRDEIR/S#2DEIS, under the Aerial Design Option Locally Preferred Alternative (LPA), airborne noise would affect residences in the Lomita Park and Airport Park neighborhoods near the BART alignment. The mitigation is to construct a landscaped sound wall along the western edge of the CalTrain right-of-way.

Residents from the Lomita Park and Airport Park neighborhoods would need to drive to or take a feeder bus, bicycle, or walk approximately 0.75 miles to access the Tanforan BART Station.

- S25.4 Downtown San Bruno....Businesses...have a large and growing regional clientele who could benefit from regional transit, but BART would bypass downtown San Bruno underground. Unless it deals with that negative environmental effect of the airport extension, the report is grossly remiss.

Response. The Aerial Design Option LPA includes a San Bruno station at the Tanforan Shopping Center. The City of San Bruno supports "Alternative VI with a BART station integrated into the Tanforan Park Shopping Center..." The City of San Bruno submitted a "Tanforan/BART Concept Plan" to BART for consideration in the BART–San Francisco Airport Extension. The city does not prefer an alternative with a downtown station, as proposed by the commentor.

The environmental impacts of the various alternatives and design options are fully disclosed in the DEIR/SDEIS and FRDEIR/S#2DEIS. Both Alternatives IV and V include a downtown San Bruno station, and effects of a station at this location are contained in the DEIR/SDEIS.

S26. KNIGHT, MARTI

- S26.1. Along with the 1995 San Mateo County grand jury, our city council continues to favor spending federal and county transit money on CalTrain upgrades. CalTrain remains the only alternative that serves the whole Peninsula.

Response. The commentor's support for an upgrade to the existing CalTrain system is noted. Please refer to Response 10.3 for a discussion of the implications of the BART project for future CalTrain service and improvements. Please also refer to Response 22.1 for a discussion of the proposed alternatives and upgrades to CalTrain considered in the *CalTrain San Francisco Downtown Extension/System Upgrades Final Report*, March 1994, and to Response 32.72 regarding the complementary nature of BART and CalTrain.

- S26.2. Four area transportation agencies have passed unanimous resolutions seeking a direct CalTrain link to the San Francisco airport light rail. One agency is SamTrans, your partner in the BART SFO project. You have failed to even acknowledge the existence of these resolutions in your latest environmental document.

Response. An historical overview is provided in Chapter 1, Introduction, of the FRDEIR/S#2DEIS. Please refer also to Responses 4.9, 13.4 and S45.1 regarding the CalTrain link to the ALRS.

- S26.3. The southern Y section of Alternative VI, including the Millbrae Avenue station, is unacceptable to Burlingame. The traffic, parking, noise, impact on minority populations, loss of affordable housing and demand for community services are unacceptable.

Response. Please refer to Response 26.6 for a discussion of south leg of the wye.

S26.4. We also question the financial capability of SamTrans to meet the required capital costs and operating subsidy for the project, while BART and City of San Francisco shoulder none of the expense....We do not want to reduce existing service or risk SamTrans financial future on a project which does not serve all of our county's needs.

Response. Please refer to Responses 6.67 and 6.71 for a discussion of SamTrans' capacity to support the project.

S26.5. Your addition in this latest environmental document of storage for 60 BART cars and an inspection pit in Burlingame next to two senior housing projects is an example of your attempt to add to the impact of this project all in the name of slight modifications of Alternative VI.

Response. The FRDEIR/S#2DEIS addresses only significant new or different impacts related to the Alternative VI Aerial Design Option and ancillary facilities. Page 2-9 of the FRDEIR/S#2DEIS states that train storage for up to 60 BART cars would be provided on the tailtracks in Burlingame (south of the Millbrae Avenue Station). Visual quality impacts and noise and vibration impacts on the senior care facilities are discussed in the FRDEIR/S#2DEIS on pages 3.3-2, Impact 3, and 3.9-5, Impact 8, respectively.

S27. KRIPS, R.

S27.1. The grand jury is totally and absolutely correct when they came out with their report that not enough information was given to the populace. What I would like to know is, I never did find out, whose idea was it to put this on the ballot again?...The BART organization, I wouldn't trust them to run a streetcar from one end of my street to the other.

Response. Please refer to Response 32.72 for a discussion of the grand jury report.

S28. LAVULO, LOLA

Please refer to Response 53.1 for a response to Ms. Lavulo's spoken comments.

S29. LINKS, BO

S29.1. There are other alternatives that are as much as a quarter of a billion dollars cheaper that carry more people to the airport, more people through San Mateo County, more people to San Francisco.

Response. The capital costs, operating and maintenance costs, transportation effectiveness, and the Cost Effectiveness Index (Table 6-10) are shown in Chapter 6, Financial Analysis, of the DEIR/Technical Appendix for Alternatives V-B and VI, and in Chapter 6 of the FRDEIR/S#2DEIS for Aerial Design Options X and B. Alternative V-A, with one station south of the Hickey Station (either I-380 San Bruno or Downtown San Bruno), is discussed fully in the DEIR/Technical Appendix. The Aerial Design Options X and B to Alternative VI, with three stations south of the Hickey Station (Tanforan, Airport International Terminal [aerial], and Millbrae Avenue), are discussed fully in the FRDEIR/S#2DEIS.

As presented in Chapter 6 of the FRDEIR/S#2DEIS, the cost effectiveness of Alternative V-A with the I-380 San Bruno Station, is \$19.84 per new transit rider. This compares to \$28.76 for Alternative VI, \$26.32 for Option B, and \$26.12 for Option X.

Public input regarding the merits of different alternatives was considered by the BART and SamTrans boards in selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) at the close of public review period for Volume II of the FEIR/FEIS. Please refer to Response 10.3 for further

discussion of the selected LPA. Please also refer to Chapter 1, Volume I of this FEIR/FEIS, which explains why BART is pursuing an aerial alignment into the SFIA.

- S29.2. The question is whether it's going to bankrupt SamTrans. People are forecasted to go off buses and on to BART. That is revenue away from SamTrans. 19,000 people off CalTrain. SamTrans has to pay to operate this system with diminishing federal subsidies.

Response. Please refer to Response 6.72 for a discussion of SamTrans' capacity to support the project.

- S29.3. I share the request and the hope of San Bruno for mitigation. My client, with 400 employees, desperately needs that mitigation. What I fear is that when it comes time to mitigate, what BART will be saying is, gee, the well is dry.

Response. Please refer to Response 6.77 for an explanation of BART's responsibilities related to the mitigation of significant impacts that would result from implementation of the BART project.

S30. LIVENGOD, CAROLYN

- S30.1. I keep hearing comments that BART isn't even sure it can afford this project....If you don't know if you have the money for it, why are you going ahead with something?

Response. Please refer to Response 16.16 for a discussion of the development of the displacement costs for the project; Response 16.3 for a discussion of capital costs; Response 6.67 for a discussion of the financial plan; and the financial analysis, Volume I of this FEIR/FEIS for a revised preliminary financial plan.

Please see Response 17.2 for a discussion of project benefits.

- S30.2. I am trying to figure out what benefit this BART is going to be to people coming from south to north. The traffic right now on 101, 380, 280, Skyline Boulevard is horrendous, let alone what it's going to do to the streets in the local cities.

Response. Please refer to Response 7.6 for a discussion of BART-related traffic impacts to I-280, Skyline Boulevard, which was included in the subarea traffic model network, would be used by local traffic and traffic from I-280 to access the Millbrae Avenue Station (as discussed in Response 7.6), but this additional BART-related traffic would not result in significant traffic impacts. Please refer to Responses 6.16 and 18.9 for a discussion of traffic impacts on Highway 101, I-380, which was also included in the subarea traffic model network, would be used by traffic to access the BART station in the City of San Bruno, but this additional BART-related traffic would not result in significant traffic impacts.

The subarea traffic model projects that the north/south traffic under the Alternative VI Locally Preferred Alternative (LPA) and the Aerial Design Option LPA would be lower on the sections of Highway 101, I-280, and Skyline Boulevard that are north of the Millbrae Avenue Station than under the No Build Alternative.

- S30.3. What bothers me here is the fact that we can be spending these monies that we saved in upgrading CalTrain in improving some of the streets that we already have trouble on. Examples, Sneath Lane to San Bruno Avenue, up on Skyline Boulevard, is a mess.

Response. The resources that would be applied to BART extension construction are not transferable to the CalTrain extension to downtown San Francisco or to programs for improvements of local city streets. Please refer to Response 23.11 for a discussion of funding for the proposed rail projects.

S31. LYONS, LARRY

- S31.1. The new alternative aerial alignment best serves the regional extension of BART in two significant ways. It brings passengers and employees closer to the new international terminal and the light rail system will connect better than Alternative VI did.

Response. The commentor's support for the Aerial Design Option LPA is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

- S31.2. I do think now is the time that we need to bring all the agencies together and really plan the system. I think some of the speaker's concerns about the feeder coming into the BART system are justified and that SamTrans should take a hard look at the feeder system and really work on bringing the passengers in and mitigate a lot of this traffic.

Response. SamTrans, BART, the SFIA, Caltrans, the Peninsula Corridor Joint Powers Board (JPB), the Federal Transit Administration (FTA), the Metropolitan Transportation Commission (MTC), and the affected cities have all conducted numerous meetings to plan the proposed BART-San Francisco Airport extension.

As described on pages 2-24, 2-38, 2-46, 2-52, 2-53, 2-61, and 2-75 in the DEIR/Technical Appendix, for all of the BART build alternatives, SamTrans buses would be rerouted to serve the proposed BART stations. As an input to MTC's transportation modeling process, assumptions were made regarding which SamTrans bus routes would serve the proposed BART stations. These bus rerouting assumptions do not represent a plan by SamTrans as to how it would reroute its bus service if a BART build alternative were selected as a project.

SamTrans will evaluate rerouting its bus routes prior to opening BART extension service. SamTrans will follow its standard procedure of giving public notice and holding public hearings prior to any changes in its bus routing.

S32. MALLORY, BRENDA

- S32.1. While the revised document suggests that the aerial options result in cost savings and a reduced need for funding, our review indicates that these savings may be eviscerated by omitted and underestimated costs, on the order of 70 to \$140 million, unanticipated environmental mitigation costs, and the effects of inflation.

Response. Please refer to Response 6.75 for a discussion of the financial information provided, and Response 6.68 for a discussion of the capital cost estimates and inflation.

- S32.2. ...BART continues to rely on sources of funding that are very uncertain. Congress has already pared back appropriations for the BART SFO extension and has made clear that it is not yet prepared to make a long-term financial commitment for this project, which still scores poorly on FTA's cost-effectiveness rating. In addition, local funding from sources like the State of California and SamTrans as well as the extent of SFIA funding remains uncertain.

Response. Please refer to Response 16.16 for a discussion of the development of the displacement costs for the project; Response 16.3 for a discussion of capital costs; Response 6.67 for a discussion of the financial plan; and the financial analysis, in Volume I of this document for a revised preliminary financial plan.

S32.3 ...Both the federal and state resource agencies have stated that disturbance of the habitat on the west of Bayshore property could result in the extinction of the San Francisco garter snake on the site. If BART decides to go forward with Option B or X, it must ensure that the environmental impacts do not render the project vulnerable to court challenge.

Response. The Section 7 consultation process, as required under the federal Endangered Species Act, has been completed. Please refer to the Biological Assessment and Biological Opinion of the U.S. Fish and Wildlife Service in Volume V of this FEIR/FEIS for more details.

S32.4. ...The transit benefits of the project may be vulnerable to challenge. Transit projections contained in the environmental document do not identify clear transit benefits and consistent support for the aerial options.

Response. The change in transit person trips, or linked trips, is used to estimate the number of new transit riders that are being attracted onto transit vehicles. Please refer to Response 32.36 for a discussion of the increase in linked trips under the Aerial Design Option Locally Preferred Alternative (LPA).

S33. MANGOLD, SANDRA

S33.1. BART and SamTrans needs to respond to this Grand Jury report and its final environmental impact report.

Response. Please refer to Response 32.72 for a discussion of the grand jury report.

S34. MCINTOSH, TERESA

S34.1. Fifth Addition Neighborhood Association in San Bruno. Our association reaffirms...support for the Alternative VI with the Tanforan BART station concept plan...We also have no objection to the fact of adding the SFO aerial design option to Alternative VI.

Response. The commentor's support for the Alternative VI Aerial Design Option with the Tanforan Station Concept Plan is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

S34.2. The BART vertical alignment of Alternative VI LPA is described as a retained cut from South Spruce Avenue to San Bruno Avenue in San Bruno. It should be noted that most of the negative impacts on the Fifth Addition neighborhood are based on the existence of this retained cut alignment. If the Tanforan BART station concept plan were accepted, the negative impacts on the Fifth Addition would be mitigated by the BART tracks constructed in a subway vertical alignment.

Response. BART is proposing to modify the Tanforan Station under Alternative VI to incorporate many features of the Tanforan/BART Concept Plan submitted by the City of San Bruno. Please refer to Response 18.4 for detailed discussion of the proposed features of the Tanforan/BART Concept Plan to be incorporated as part of the BART project. Please also refer to Response 18.9 for discussion of the Federal Transit Administration Livable Communities Initiative and potential monies available to cities along the alignment for site-specific station area planning.

S34.3. On page 3, Figure 1, of the Design Appendix, it states: Relocate CalTrain station during construction. I cannot find in the text or in the drawing where the temporary site will be....The following questions therefore arise. One, the potential commuter parking in the Fifth Addition residential area. What will be the control? Two, traffic circulation...Note that the Fifth Addition has only Herman Street as the

access in and out of the area toward the south and the west. How will this be affected? Three, will there be SamTrans bus connections to the CalTrain station? If yes, what will be its route? Four, the wide public street area at the south end of Diamond Street adjacent to the Herman Tot Lot can potentially be used by vehicles as a turnaround. What are the safety factors, considering that the small city park is extensively used by preschoolers and small children?

Response. The current San Bruno CalTrain Station would be temporarily relocated under the I-380 highway structure. The space under the structure would be leased from Caltrans to provide an equal number of parking spaces. Primary access would be from San Mateo Avenue and not Herman Street. Final layout and services by SamTrans would be coordinated with the City of San Bruno and SamTrans. The potential for U-turns on Herman Street at the intersection with Diamond Street would be prohibited through the use of traffic signage and the placement of temporary traffic islands on Herman Street, pending approval from the City of San Bruno, which has jurisdiction over local streets.

Please also refer to Response 8.2 for a discussion of the relocation of the San Bruno CalTrain Station during construction of the BART extension.

S35. MORSE, DORIS

- S35.1. This council endorsed and still favors Alternative VI, with its bored tunnel, but we believe that the aerial compromise struck between the airports commission and BART's board of directors is workable. However, we are opposed to any consideration of at-grade alignment in Millbrae.

Response. The commentor's support for Alternative VI with a bored tunnel configuration into the SFIA is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. The Aerial Design Option LPA limits the at-grade alignment to the Millbrae Station and tailtracks area. The at-grade Millbrae Station allows a cross-platform transfer with the Peninsula Corridor Joint Board Powers Board's CalTrain service.

- S35.2. We are deeply concerned with the traffic impacts on Highway 101 and the Millbrae Avenue interchange, on the Millbrae Avenue and El Camino Real intersection, and the potential impacts on our feeder streets from 280. That's Millbrae Avenue, Hillcrest, and Larkspur Drive. And all traffic mitigations -- and I say that all -- must be fully funded.

Response. Please refer to Response 7.4 for a discussion of impacts to Millbrae Avenue at the intersection with El Camino Real and to the Millbrae Avenue interchange with Highway 101. Please refer to Response 7.6 for a discussion of traffic impacts relating to I-280 including on Hillcrest Boulevard. Please also refer to Response 62.2 for a discussion of traffic impacts relating to Larkspur Drive. Please refer to Responses 7.4 and 7.7 for a discussion of funding traffic improvements in the City of Millbrae.

- S35.3. Issues on environmental and quality of life include noise and vibrations at Lomita Park School, Sierra Nursing Facility, and the adjacent neighborhoods of Airport Park, Bayside Manor, and Marino Vista.

Response. All of the areas mentioned in this comment have been evaluated for the significance of noise and vibration impacts associated with the project. Noise and vibration impacts are analyzed on pages 3.9-2 through 3.9-6 in Section 3.9 of the FRDEIR/S#2DEIS.

As indicated on page 3.9-1 of the FRDEIR/S#2DEIS, noise and vibration impacts for the Aerial Design Option LPA would be fewer in many of the areas mentioned by the commentor, compared to the impacts associated with some of the other alternatives considered in the DEIR/SDEIS.

As indicated on page 3.9-3 of the FRDEIR/S#2DEIS, Lomita Park School would be affected by BART train noise from the at-grade portion of the alignment. A sound wall was presented as a means of reducing this noise impact. The proposed crossover near homes in Millbrae (Marino Vista and Millbrae Manor neighborhoods) was identified as a potential source of groundborne noise and vibration impact, and feasible mitigation was presented.

- S35.4 We want to see the visual impacts of this aerial alignment and we want to see mitigations for screening them.

Response. Although the written description portrays the visual quality of the structure, a figure following Response 7.11 is added to this volume of the FEIR/FEIS to show the approximate scale and mass of the aerial guideway relative to the open space and Highway 101 ramps. Given the height and mass of the aerial structure, there are no feasible mitigation measures to screen views from neighborhoods in northern Millbrae. This impact is described in paragraph seven, sentence one, on page 3.3-3 of the FRDEIR/S#2DEIS.

- S35.5 We are concerned about the wetlands habitat, the existing trees, and vegetation on this site.

Response. Please refer to Responses 12.15 and 16.34 for discussions of regulatory procedures, requirements, and proposed mitigation measures for adverse impacts to wetland and other sensitive habitats. The FEIR/FEIS discusses impacts to other vegetation communities, including trees.

- S35.6 We would like to see a linear bike path considered on this rail corridor.

Response. Please refer to Response S44.4 for further discussion of this issue and to Volume I of this FEIR/FEIS for a general description of a proposed bike path utilizing the BART right-of-way.

S36. PARKER, SHERWOOD

- S36.1 Some of you probably know the very successful London operation....[The] director of planning....wrote me a letter saying that, essentially, they get not five percent, [of total trips]...but 40 percent of the traffic into downtown London goes by those trains....I live in the East Bay. I, however, work in San Mateo County. I am looking forward someday to BART being extended and going all the way and being no traffic problem for you....

Response. The commentor's support for the BART-San Francisco Airport Extension is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

S37. PINCUS, MELVIN

- S37.1 I am disappointed that the tunnel plans originally recommended were dropped due to financial constraints. However, as an alternative, I find that the new proposed Option B is an acceptable plan, subject to additional mitigation measures that have been proposed by the City of Millbrae and my own comments.

Response. The commentor's support for the Aerial Design Option (Option B) is noted. Commentors' input on the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option (Option X) as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. BART has tried to incorporate as many of the mitigation measures and design refinements put forth by the City of

Millbrae as are feasible. These changes have been analyzed in the FRDEIR/S#2DEIS where appropriate.

- S37.2. The report, unfortunately, makes no reference to the significant environmental impact from traffic feeding off Highway 280 north to Highway 280 south and Skyline Avenue at Trousdale....[There is] a mistaken belief that most drivers using the above highways and streets will opt to drive farther north and east to utilize the Tanforan, Colma and Daly City parking areas. This is quite unbelievable.

Response. Please refer to Responses 7.6 and 62.2 for discussions of traffic impacts relating to I-280 and use of Trousdale Avenue, Murchison Drive, and Millbrae Avenue. Please refer to Response S30.2 for a discussion of traffic impacts relating to Skyline Drive under the Aerial Design Option LPA.

- S37.3. Traffic studies should be made in order to determine the extent of mitigation required, which could include, among others, additional arterial stops, stop lights, safety patrols at Spring Valley School, speed bumps, and other measures recommended by the police department.

Response. The traffic volumes forecasted to travel eastbound during the A.M. peak hour and westbound during the P.M. peak hour, the peak directions would be too low on Murchison Drive, the location of the Spring Valley School, to require specific traffic mitigations. Please refer to Response 7.6 for a discussion on the BART-related traffic volumes on Murchison Drive as well as other roadways that provide connections between I-280 and El Camino Real in the vicinity of the Millbrae Avenue Station.

- S37.4. Sound walls specified in mitigation should include trees to be planted to help overcome the visual impact to affected Millbrae residential areas.

Response. Aesthetic issues associated with sound walls can be addressed through design, landscaping (e.g., plantings in front of the wall), or possibly through the use of a sound wall on top of an earthen berm. Visual impacts associated with sound walls are addressed on pages 3.3-1 through 3.3-2 of the FRDEIR/S#2DEIS. Visual impacts were determined to be insignificant.

- S37.5. I am particularly concerned about problems as it pertains to the Millbrae Elementary School District and to the Lomita school, which is directly impacted by the plan. My concerns are particularly in terms of safety during construction and recovering the substantial loss in ADA, average daily attendance, monies due to a decrease in student enrollment directed related to the Garden Lane area.

Response. Please refer to Responses 6.40 and 11.9 for discussions of the project's effect on public school income, access, and safety.

S38. QUEEN, DEHNERT

- S38.1. I've got over here a scale model that I have had in place since 1989. It essentially gets you using CalTrain directly from downtown San Francisco, directly into the airport passenger terminals, with a loop off the main line track. This plan was put in place -- it's gone through ten EIRs and EISs. It has been deleted in every one of them.

Response. Mr. Queen proposed this "Transit Link System Alternative Including An Aerial CalTrain Loop to Airport Terminals" at the scoping meeting for the DEIR/SDEIS held on July 8, 1993. This alternative was evaluated and eliminated from further study in the *BART-San Francisco Airport Extension Screening of Alternatives Report*, August, 1993. On August 20, 1993, the Steering Committee (composed of four members of the BART and SamTrans boards) voted 5 to 0 to accept staff's recommendation. A summary of this proposed alternative from the screening report follows below.

Phase I of the proposed Transit Link System alternative extends CalTrain in subway to the Ferry Building (Justin Herman Plaza) in downtown San Francisco, stopping at the BART Embarcadero Station. CalTrain would also be extended to the San Francisco Airport passenger terminals via a direct aerial "loop" from the existing CalTrain mainline track. Service to Peninsula cities, San Jose, and the Gilroy area would be improved through better grade separations. Phase I also provides an extension of Muni Metro service in a subway from the Market Street Embarcadero Station to an at-grade "turn-around loop" within the Small Business Center facility (for both Market Street and Hunter's Point trains).

Phase II of the Transit Link System provides direct connection with the East Bay and points north, south, and east via the Hannigan proposal (Assembly Concurrence Resolution #132) by rebuilding an existing Southern Pacific Transportation Company bridge just south of the existing Dumbarton Bridge. Phase II would also extend Muni Metro south on a surface alignment along the Third Street Corridor to the Hunter's Point area and/or along Geneva Street to the Cow Palace, with a connection to San Jose Avenue Metro/BART Center. This larger loop would duplicate service provided by Muni operation.

Phase III provides an extension of rail service along the waterfront, across the Golden Gate Bridge, and through Marin County to Sonoma County.

Phase I of this alternative involves the construction of an aerial structure connecting the CalTrain mainline track with the airport terminals. The CalTrain station platforms would be located along the loop road above the passenger drop-off area. The radius of the passenger drop-off loop road is approximately 600 feet. The minimum radius criteria for a CalTrain curve is 1,000 feet, using a maximum super elevation of 6 inches. It is also preferred that CalTrain station platforms be on a straight tangent, not on a curve. The CalTrain station platforms along the airport loop road would be on a sharp curve.

This alternative proposed a CalTrain aerial loop serving the airport terminal, which violates CalTrain design standards. Additionally, in order to achieve the project objectives, this proposed alternative extends outside the San Francisco-to-SFIA corridor, violating a screening minimum threshold criteria. Therefore, this alternative was not recommended for further study.

- S38.2. I...contacted Congress, and the things that BART and SamTrans and the rest of them aren't telling you has to do with the conference report put out by the House and the Senate dated October 20. Essentially, they're saying they're going to cut off BART's funding for the year 1996 because there are serious problems.

Response. The House-Senate Conference Report does not state that "they are going to cut off BART's funding." The language of the report is focused on directing BART and SamTrans to provide additional information to the U.S. Congress on the funding plan for the project, and assurances that the project will follow all appropriate regulations. The two agencies are responding to the direction of Congress and are complying with the specific language of the report.

S39. RAISER, JOHN

- S39.1. I would like to come out and publicly support the aerial system. It's not perfect. It's a compromise. But it is one that is at hand. It is one that finally can see us have a system that will mitigate the problem that we have all caused. The problem is the pollution.

Response. The commentor's support for the Alternative VI Aerial Design Option is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) in November. Please refer to Response 10.3 for further discussion of the selected LPA.

- S40.1. I do not understand from the drawing here why they want to move this railroad station a few feet west. And what is going to happen to the railroad station? Who is going to look for it? Is BART or SamTrans? I suggest that if we are going to maintain that building, let us move it to another area completely. I would suggest up near the museum, where there is room, and it can be taken care of and valued as a historic building here in Millbrae.

Response. Based on information obtained while refining preliminary project engineering, moving the station to the west will not be necessary. Please refer to Responses 4.3 and 4.5 for a discussion of the revised plans for the Millbrae CalTrain Station.

S41. SCHMIDT, ALFRED

- S41.1. I agree with the finding of the San Mateo County grand jury and feel that our limited funds for transit in San Mateo County are better spent on CalTrain. If BART goes to the airport I am opposed to running an extension from there to Millbrae and see no reason for it. Better yet, stop BART at I-380, where there is an opportunity for a joint station with CalTrain. Even better yet, start BART at Colma and use the bus to the airport.

Response. The commentor's opposition to the BART–San Francisco Airport Extension and support for an upgrade to CalTrain are noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) in November. Please refer to Response 10.3 a discussion of the selected LPA and implications of the BART project for future CalTrain service and improvements. Please also refer to Response 22.1 for a discussion of the proposed alternatives and upgrades to CalTrain considered in the *CalTrain San Francisco Downtown Extension/System Upgrades Final Report*, March 1994. Please refer to Section 1.3 of the Summary DEIR/SDEIS, which explains the need for the project, and to Response 23.2 for a discussion of studies demonstrating the need for a rail transit project south of Colma.

S42. SCHULTZ, MARCY

- S42.1. I am here to emphasize that we do now support this project and we pledge to do anything we can to help bring it about.

Response. The commentor's support for the BART–San Francisco Airport Extension is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA.

S43. SCHWARTZ, RICHARD

- S43.1. Table ES-2 of the FRDEIR indicates that all alternatives will reduce the level of service on Highway 101. This is false. According to the DEIR, Alternative II, the TSM Alternative, will reduce, not increase, Highway 101 traffic. Alternative VI, however, is projected to bring about gridlock traffic jam on Highway 101, extending from Millbrae Avenue all the way south to Third Avenue in San Mateo.

Response. Please refer to Response 64.5 for a discussion of traffic impacts on Highway 101 under the Alternative VI LPA and the Aerial Design Option LPA relative to the TSM Alternative.

- S43.2. BART also projects major congestion at the intersection of Broadway and California Drive in Burlingame due to the Millbrae BART station. A cross to the overpass will almost be required as well.

Response. Please refer to Response 64.18 for a discussion of traffic impacts at the intersection of Broadway and California Drive.

- S43.3 Less than 5.4 percent of all total trips to the airport for all reasons combined from all directions will be by BART. These figures are trivial and do not justify \$1.1 billion for BART.

Response. Please refer to Response 23.2 for a discussion of the reasons justifying the BART–San Francisco Airport Extension.

- S43.4 The trip from Millbrae to downtown will take 45 minutes on BART but only 25 minutes on CalTrain, a savings of 40 minutes per day. The annualized capital cost of Alternative 2 will be \$19.9 million versus \$105 million for BART, a ratio of 5.3 to one.

Response. Alternative II (TSM Alternative) does not include the CalTrain extension to downtown San Francisco. Under Alternative II, annualized capital costs would be \$19.90 million, but travel time between downtown San Francisco (Market and Montgomery Streets) and Millbrae would be approximately 54 minutes (11 minutes on Muni between Market and Montgomery Street to the CalTrain Station, 15 minutes to wait for CalTrain based on approximately half-hour headways during the peak period, 28 minutes on CalTrain to Millbrae Station), while BART travel time between downtown San Francisco and Millbrae is estimated at 44 minutes, and offers patrons the option of eight BART stations as opposed to the single 4th and Townsend terminus. Please refer to Response 6.11 for further discussion of travel time.

The 25 minutes on CalTrain from the Millbrae Station to the San Francisco terminus station at 4th and Townsend Streets is the express travel time and would be compared to 26 minutes from the Millbrae Avenue Station to the Civic Center in San Francisco. These times represent strictly travel time on the train and do not include wait time for the train or access time to the final destination. For example, the travel time of 44 minutes from the Montgomery Street BART Station to SFIA terminals listed in Table 3.2-1, Transit Travel Times, of the FRDEIR/S#2DEIS, includes walk access time to the final destination, as well as wait time for the train.

S44. SIMON, ED

- S44.1. Four of the five council members, with the new council members being seated that were newly elected, have reaffirmed their support for Alternative VI. Alternative VI, with the integrated Tanforan station, with an alignment through San Bruno, that includes a bored tunnel or an engineered subway from Euclid Avenue south of Angus.

Response. The commentator's support for Alternative VI with an integrated Tanforan Station and a bored tunnel or engineered subway configuration through the City of San Bruno is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Alternative VI Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Response 24.1 for a discussion why the bored tunnel construction method through San Bruno is considered infeasible.

- S44.2. I want to briefly just go over some of the concerns. First of all, the impacts of our existing CalTrain station as it will be relocated temporarily under I-380 during the construction period and no adequate parking for the CalTrain station.

Response. Please refer to Response S34.3 for a discussion of the relocation of the San Bruno CalTrain Station during construction of the BART extension and the impacts to parking at this station.

- S44.3. Concern about the 101 San Bruno Avenue interchange and the traffic circulation from the new proposed changes.

Response. Please refer to Response 8.43 for a discussion of traffic impacts to San Bruno Avenue under the Aerial Design Option LPA.

- S44.4. We want to see the bicycle paths incorporated along any BART or CalTrain alignment.

Response. Once the cut-and-cover subway construction is completed, the surface area would be returned to its natural state of native grasses and other plant types found in the immediate area. The only exceptions to returning the right-of-way to its original conditions are at locations where access and ventilation shafts project above grade, approximately at 3,000-foot intervals. Free access would be provided across the right-of-way. BART is entertaining the concept of a bicycle path above BART's subway from Mission Road to the proposed Millbrae Station, where right-of-way is available. The BART project would not acquire rights-of-way or provide for continuation of a bicycle path on property not proposed for the BART alignment. BART and SamTrans will take the lead in design, planning and environmental clearance of a bike path. BART proposes a Joint Powers Authority (JPA) including BART and other local agencies, to coordinate issues such as crossing of the arterial; compatibility with local traffic, local zoning, and general plans; coordination with existing bike path plans; need for additional right-of-way; and amenities, funding sources, maintenance, and operations that need to be resolved. If the path is approved, BART would entertain incorporation of the bicycle path into the construction of the SFIA extension on portions of the path route owned by BART and as funding is available. The JPA or other agencies would need to accept responsibility for maintaining the bicycle path after construction.

In general, BART supports the concept of bike and other non-auto modes of access to BART stations. Therefore, use of available right-of-way by local jurisdictions for a bikeway would be encouraged and, during BART construction, efforts would be made to facilitate this use wherever possible.

- S44.5. We have a large community gardens area that will be reconverted back to wetlands, with no notice as to where the new community gardens area will be.

Response. Please refer to Response 8.10 for a discussion of the use of community gardens as wetland mitigation.

- S44.6. There will be sound walls and lots of visual effects. There will be tree loss and no indication of how this will be handled.

Response. The visual effects of the sound walls were addressed in the FRDEIR/S#2DEIS in Impacts 1, 2, and 3 on pages 3.3-1 and 3.3-2. Please refer to Response 53.10 regarding revisions to Impacts 1 and 2. Impact 3 on page 3.3-2 addresses the loss of trees. Sound walls will be landscaped to mitigate the loss of eucalyptus trees, although the original number of trees and density of vegetation will not be replaced.

- S44.7. There will be noise and vibration impact with the aerial design on both our Belle Air and Lomita Park areas.

Response. Noise and vibration impacts, and mitigation of those impacts, are addressed in the FRDEIR/S#2DEIS on pages 3.9-5 and 3.9-6 of Section 3.9, Noise and Vibration. The Belle Air and Lomita Park areas are far enough away from the aerial structure to not be significantly impacted by noise. The at-grade portion of the alignment proposed in the FRDEIR/S#2DEIS would affect homes in the Lomita Park area, as indicated on page 3.9-3, and a sound wall would be the means of mitigating this impact.

S44.8. We are very concerned about the children's safety at Belle Air School both during and after construction.

Response. Please refer to Response 11.1 for a discussion of safety concerns related to the Belle Air School during construction of the BART extension. Please refer to Response 24.4 for a discussion of construction impacts to Angus Avenue, which provides vehicle and pedestrian access across the proposed BART alignment to the Belle Air School.

S44.9. BART scheduling on weekends is a concern to us. If scheduling changes and there are no schedules for BART stops at Millbrae on weekends, then the Tanforan station could become a park-and-ride for an end-of-the-line station. That needs to be looked into, because we didn't consider that we selected the number of parking spaces.

Response. The operating plan for the Aerial Design Option LPA is described on page 2-18 of the FRDEIR/S#2DEIS. BART would operate a dedicated shuttle train between the Millbrae Avenue Station and the new Airport International Terminal weekdays and Saturdays, except late night. Late night weekdays and Saturday, and all day Sunday, the shuttle service would not operate, and the Concord route through San Francisco would provide service from Millbrae to the new Airport International Terminal. As described in the FRDEIR/S#2DEIS, BART's operational plans provide service to Millbrae on weekends. BART plans to provide service to the Millbrae Station on weekends.

In addition, the commentor is referred Response 8.39 for a discussion of parking and traffic using the Tanforan instead of the Millbrae Station on Sundays or late night Saturdays.

S45. SPINELLI, MIKE

S45.1. Why should \$160 to \$200 million extra - BART refuses to tell exactly how much this leg to Millbrae will cost - be spent on an extension that will be a duplicate of one already planned and paid for as part of the San Francisco International Airport expansion project? I am referring to the light rail system connected to CalTrain that is currently under study.

Response. The traffic volumes used to assess the impacts of the BART-San Francisco Airport Extension, in the FRDEIR/S#2DEIS, as well as the Summary DEIR/SDEIS do not include the proposed CalTrain extension in downtown San Francisco. Please refer to Response 58.2 for a discussion of the need for the south leg of the wye under the Aerial Design Option LPA.

The possible Airport Light Rail connection to CalTrain is the topic of another study. The San Mateo County Transportation Authority and the Peninsula Corridor Joint Powers Board (JPB) are cosponsoring the CalTrain-San Francisco International Airport Light Rail System Connection Feasibility Study. The study is evaluating the feasibility of connecting the light rail transportation system currently being designed by the San Francisco Airport to CalTrain and will be completed in April 1996. The connection of the Airport Light Rail System (ALRS) to CalTrain is an independent feasibility study and is separate from the proposed BART-San Francisco Airport Extension. The BART alternatives are stand-alone alternatives.

The airport and BART have been working together to make the BART-SFIA Extension project a reality. The Airports Commission will consider the JPB's recommendation at the conclusion of the *CalTrain-San Francisco International Airport Light Rail System Connection Feasibility Study*. Since the results of the potential ALRS connection to CalTrain under study in the Feasibility Study are not known, and since any proposed alternative lacks environmental clearance, identified funding sources, and is not part of MTC's Resolution No. 1876, it is premature to say that it is planned and funded. The commentor is referred to Response 13.4 for additional discussion of the ALRS connection to CalTrain.

In 1994, the JPB requested that the airport proceed with further investigation of the CalTrain-ALRS connection. The airport responded that any further action on the connection issue should be delayed pending the outcome of the BART–San Francisco Airport Extension study.

Airport staff are working with and providing information to the JPB and San Mateo Transit Agencies to conduct the CalTrain-ALRS connection feasibility study. The ALRS is also being designed to preserve the ability to extend the system to serve the airport's west of Bayshore property. However, the San Francisco Airports Commission and the BART and SamTrans Boards of Directors have determined a preferred location for the airport BART station.

In 1995, the JPB also inquired about the Airports Commission's position and legal commitment for an ALRS connection to CalTrain. Based on this request, the San Francisco City Attorney has rendered a legal opinion on the airport's commitments to making an ALRS connection to the west of Bayshore property for a CalTrain station. The legal opinion is summarized below.

Issue Did the Airports Commission, through its adoption of the Airport Final Mitigation plan, commit to extending the Airport Light Rail System "(ALRS)" to the west of Bayshore for a CalTrain Station?

Conclusion No. The relevant measure in the Final Mitigation Plan provided for an ALRS extension to a combined BART/CalTrain station, and not to a CalTrain only station. Although the Commission is not legally required to extend the ALRS to the west of Bayshore for a CalTrain station, the Commission has discretion to consider such a proposal, subject to legal requirements.

In short, the airport has not agreed to pay for the extension of the ALRS to connect with CalTrain.

- S45.2. Why should we pay \$160 to \$200 million extra to displace 500 low income people, representing 17 percent of Millbrae's minority population, when the ALRS would move the same number of people to the airport and displace none?

Response. Displacement of low income residences would result from location of the Millbrae Station and not the aerial wye segment of the alignment. This same displacement would occur under the Alternative VI tunnel as well. Please refer to Response S45.1 regarding the aerial wye alternative and the ALRS, which is the subject of a separate study that is also described above.

- S45.3. Why should we pay one billion dollars to transfer 19,000 riders to BART from CalTrain, an existing system that will go to the same place in less time, for less money? Why should San Mateo County bear the entire local cost to connect San Francisco to its own airport and to build two extensions in the East Bay? BART, the East Bay, and San Francisco pay nothing.

Response. Please refer to Response 23.2 for a discussion of reasons for the BART extension other than reducing vehicular trips to the airport. The BART extension would also offer patrons the opportunity to board or disembark at any of eight San Francisco stations instead of the single 4th and Townsend CalTrain terminus.

San Mateo County's commitment to funding the BART extension involves an agreed-upon payment to the district for access to the system, which was built at the expense of the three counties already in the district. In addition, the transfer of funds to the East Bay extensions is not a direct payment, but a "wash." Section IV(E) of the BART-SamTrans Agreement stipulates that for every dollar in state Transit Capital Improvement (TCI) funds made available to the BART extension, SamTrans will transfer a dollar from its commitment to the extension to BART's other Phase I extensions. According to the Resolution No. 1876 funding plan, the BART extension will receive \$98.3 million in TCI funds

and SamTrans will, in turn, transfer \$98.3 million out of its \$196.9 million share of the SFIA extensions costs to BART's East Bay extensions. This fund transfer is already in place on the Colma extension, where the CTC has contributed \$21.3 million to the project's \$170 million budget, and SamTrans has contributed \$21.3 million to BART's East Bay extensions.

- S45.4. Why is the MTC computer model being used to justify this entire project when BART, MTC, and the FTA admit that the model is seriously flawed?

Response. The Metropolitan Transportation Commission (MTC) travel demand model, used to estimate transit patronage under the alternatives studied, is the regionally approved model by Federal Transit Administration (FTA). Please refer to Responses 6.6 and 16.46 for further discussion on the use of MTC's travel demand model.

- S45.5. Why does BART use the traffic figures generated from the proposed downtown extension of CalTrain to lessen the BART traffic impacts but ignores the downtown extension when it does not come to BART's advantage?

Response. The traffic volumes used to assess the impacts of the BART extension in the FRDEIR/S#2DEIS as well as the Summary DEIR/SDEIS do not include the proposed CalTrain extension in downtown San Francisco. The traffic volumes estimated under the Aerial Design Option LPA, as with all BART build alternatives, used the CalTrain station at 4th and Townsend Streets as the San Francisco terminus of CalTrain. Using this current terminus station for CalTrain results in more traffic to and from the proposed BART extension stations than would occur under the CalTrain downtown extension, with CalTrain's San Francisco terminus station closer to Market Street.

When the CalTrain downtown extension is operational, some of the individuals who would drive and park at a BART extension station would instead drive to a CalTrain station on the peninsula and travel to downtown San Francisco. Therefore, use of the 4th and Townsend Street CalTrain terminus in the model would produce greater traffic volumes in the vicinity of the proposed BART stations than would the CalTrain terminus station closer to Market Street.

- S45.6. The answer is to take the money that will be squandered on this Y project and allocate it to the CalTrain extension and upgrade.

Response. The commentor's support for an upgrade and extension of CalTrain is noted. Please refer to Response 10.3 for a discussion the implications of the BART project for future CalTrain service and improvements. Please also refer to Response 22.1 of this FEIR/FEIS for a discussion of the proposed alternatives and upgrades to CalTrain considered in the *CalTrain San Francisco Downtown Extension/System Upgrades Final Report*, March 1994.

S46. STEINBERG, MARVIN

- S46.1. BART has concentrated all of its energies and studies on the premise that, for the most part, all proposed traffic flowing in and out of the projected Millbrae BART station will emanate from Highway 101 and Millbrae Avenue. No in-depth studies or analyses as to the flow of traffic from Highway 280 to such streets as Hillcrest Boulevard or Larkspur Drive and Helen Street have come to mind the public's attention.

Response. The added traffic on Hillcrest Boulevard, Larkspur Drive or Helen Drive resulting from the Millbrae Avenue Station under Alternative VI or the Aerial Design Option LPA would not have a significant impact to the traffic operations of those streets. Helen Drive would be expected to carry no additional vehicles under Alternative VI and the Alternative VI Aerial Design Option compared to the No Build Alternative while El Camino Real and Hillcrest Boulevard would be expected to carry an insignificant number of added vehicles under Alternative VI and the Alternative VI Aerial Design

Option. Please refer to Responses 7.6 and 62.2 for a discussion of traffic impacts relating to I-280 and use of Trousdale Avenue, Murchison Drive, and Millbrae Avenue. Please refer to Response 62.2 for a discussion of traffic impacts relating to Hillcrest Boulevard and Larkspur Drive.

- S46.2. It appears no substantial plan for the alleviation of traffic congestion west of El Camino has been broached.

Response. The traffic impacts to the west of El Camino Real in the vicinity of the Millbrae Avenue Station were examined, including for traffic that may use Trousdale Avenue, Murchison Drive, Millbrae Avenue, and Hillcrest Boulevard to access the station. Please refer to Responses 7.6 and 61.2 for a discussion of traffic impacts relating to I-280 and use of Trousdale Avenue, Murchison Drive, and Millbrae Avenue. Please refer to Response 62.2 for a discussion of traffic impacts relating to Hillcrest Boulevard and Larkspur Drive.

S47. TRAPP, ONNOLEE

- S47.1. The BART SFO aerial alternative now being considered promotes almost all the same comments that we made at the February hearing on the extension. And rather than repeat them here, we ask you to review those comments.

Response. The traffic impacts west of El Camino Real in the vicinity of the Millbrae Avenue Station were examined and included consideration of BART-related traffic on Trousdale Avenue, Murchison Drive, Millbrae Avenue, and Hillcrest Boulevard. Please refer to Responses 7.6 and 62.2 for a discussion of traffic impacts to I-280, Trousdale Avenue, Murchison Drive, and Millbrae Avenue. Please also refer to Response 62.2 for a discussion of traffic impacts to Hillcrest Boulevard and Larkspur Drive. Ms. Trapp's earlier comments and Responses to those comments are provided in Volume II of this FEIR/FEIS.

- S47.2. This FRDEIR, et cetera, does, in some analysis, include calculation for the effect of a CalTrain downtown extension...but, in other calculations, continues to ignore the CalTrain extension and the effects it would have on BART. This is unacceptable because the impacts must be accounted for.

Response. Impacts related to the CalTrain downtown extension have been examined in the FRDEIR/S#2DEIS, as well as in the AA/DEIS/DEIR. Two tables in the FRDEIR/S#2DEIS address transit patronage with the CalTrain downtown extension. These tables are Table 3.1-2, Daily Transit Operator Boardings, and Table 3.1-7, Daily Intermodal Transfers Between Rail Services. In addition, potential cumulative traffic impacts with the CalTrain downtown extension are addressed in the FRDEIR/S#2DEIS on page 3.1-14. Please refer to Responses 6.11 and 64.26 for a discussion of travel time comparisons between the BART–San Francisco Airport Extension and the CalTrain downtown extension.

- S47.3. The newly designed aerial extension has not provided the necessary intermodal connection between BART, CalTrain, and the airport light rail system....This aerial alternative presents a system which links BART and ALRS or BART and the CalTrain.

Response. The Aerial Design Option Locally Preferred Alternative (LPA) would satisfy all of the Passenger Service Quality Standards adopted by the BART board and Airport Commission. The location of the recommended BART airport station would be in front of the west wall at the departure level of the International Terminal. At least 50 percent of passengers arriving on BART would be able to reach the first ticket counter at their selected airline terminal location from the midpoint of the BART platform within a four- to five-minute walk without transfers. Moving sidewalks would be added inside the terminal to the North (United Airlines Terminal), and additional elevators and escalators would be added to facilitate passenger convenience. In addition, BART baggage check-in would be provided at both ends of the BART platform, as well as easy access to the ALRS, one level

above the BART station via escalator or elevator. Appropriate architectural treatment and fully integrated graphics and signage to provide a user-friendly atmosphere would be incorporated during final design.

The Aerial Design Option LPA also provides an efficient transit system. Overall, the Aerial Design Option is rated "high" for this goal because it provides the highest level of passenger convenience for airport-destined patrons. Of all the BART build alternatives, walking distance to SFIA International Terminal from BART would be shortest under the Aerial Design Option. It also provides direct service between Millbrae and stations north of SFIA, without requiring all trains to travel throughout the airport.

- S47.4. It is...essential to delay the decision-making process for BART in order to take into account the forthcoming study of a direct link between CalTrain and the ALRS to determine whether it is a beneficial, necessary, and feasible thing for BART to provide a part-time shuttle service between Millbrae and the San Francisco International Airport.

Response. Please refer to Response 13.4 for a discussion of the CalTrain-ALRS connection feasibility study.

- S47.5. The determination [regarding feasibility of CalTrain-ALRS connection] could also affect the length of track needed for tail track and auxiliary structures south of the point where the north side of the aerial Y leaves the main line to curve across the airport-owned west of Bayshore property to connect to the new airport terminal.

Response. Refer to Response 13.4 for discussion of the CalTrain-ALRS connection feasibility study.

- S47.6. Before a decision is made to select the new LPA, the new county travel demand model must be run to determine the impacts on the county transportation system and specifically on the streets and intersections in the area of the entire Colma to airport extension. The model can compare impacts with and without both CalTrain and BART extensions.

Response. Please refer to Response 6.25 for a discussion of the relationship of the San Mateo County travel demand model to the BART-SFIA Extension FEIR/FEIS.

S48. TWITCHELL, JON

- S48.1. Under the illogical or contradictory information category, by BART's own tables, 56 percent of the employees of the airport live south of the airport. Only 40 percent of them live north. Yet BART is predicting that only 24 percent of the transit riders accessing the airport would be on CalTrain, yet 66 percent of the riders accessing the airport as employees would be on BART. In other words, most of the people live south, but BART is predicting that all the people are going to ride on BART from the north. It makes no sense whatsoever.

Response. Please refer to Response 32.93 for discussion of daily transit patronage estimates into the SFIA for BART and CalTrain.

- S48.2. Under the category of withholding information....BART includes the capital cost of every single one of its alternatives but not include the capital cost of Alternative II. The reason for that is that Alternative II costs \$350 million. It is one-third the cost of the BART project and delivers 90 percent of the transit ridership....The ridership index cost for BART is two to five times higher than the FTA maximum, yet BART does not disclose this in the document. There is little or no local capacity to pay the operating costs for this system. BART does not disclose that. If we lose 55 percent of the CalTrain ridership at Millbrae and one-third of the SamTrans riders are impacted by the system, it is abundantly clear that there is not the money in San Mateo County to pay for this system.

Response. The estimated capital cost of the TSM Alternative is \$247 million.

Please refer to Response 6.67 for a discussion of cost effectiveness. Please refer to Response 6.71 for a discussion of the operating costs of the BART Extension. Please refer to Response 6.72 for a discussion of the capacity of SamTrans to support its portion of the capital cost of the project.

- S48.3. There is not one penny of mitigation money in this project and there is not one penny of financing money in this project, although BART is claiming it's going to fully finance the cost of construction.

Response. Please refer to Response 16.7 for a discussion of the cost of mitigation. Financing costs were not included in estimates for capital costs because financing costs are uncertain in the early stages of project development. Financing costs are expected to be lower under the Design-Build contracts than they would be with conventional contracting because a few large contracts will be let early in the construction process, thus reducing the impacts of inflation on overall costs. Please refer to Chapter 6, Volume I, of this FEIR/FEIS for further discussion of financing costs.

S49. WARD, LYN

- S49.1. Statements have been made that BART would be underground or in a subway to just south of Angus Avenue. This sounds as if anything goes, no matter how disruptive, after construction passes Angus. Belle Air cannot accept this idea. We prefer the bored tunnel.

Response. The commentor's support for the BART-San Francisco Airport Extension with a bored tunnel configuration through the City of San Bruno is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Response 24.1 of this FEIR/FEIS for discussion as to why the bored tunnel construction method through San Bruno under Alternative VI was found to be infeasible due to a number of unmitigable impacts.

- S49.2. Of the construction lay-down area suggested. We request Alternative B, with no traffic routed along First Avenue. Move Alternative B south and use the PG&E dirt roads and access to Highway 101. Protect the school and Seventh Avenue homes with a temporary sound barrier. A temporary sound barrier along 1st Avenue during construction is also necessary.

Response. Please refer to Response 8.31 regarding the construction laydown areas.

- S49.3. We are concerned about spillover parking on our streets. We have very little street parking for ourselves. Please provide a parking area elsewhere.

Response. Please refer to Response 6.26 for a discussion of spillover parking.

- S49.4. Removal of a few trees is mentioned in connection with construction aerial laydown, Alternative B. Why do you persist in thinking that a few trees, houses, businesses, whatever, do not matter? If the quantity is few, preservation must be possible.

Response. The removal of eucalyptus trees east of the CalTrain track and acacia trees west of the CalTrain track is not a significant impact, as described in the visual and biology sections of Chapter 3. Both of these are fast-growing, non-native species that provide limited habitat value to wildlife in the area. Please refer to Responses 8.31 and 20.26 for further discussion of laydown alternatives.

- S49.5. Relocation of the wetlands area near the school, playing field, park, and community gardens is unsuitable and inappropriate. Belle Air does not want the school park and community gardens

disturbed. Relocate the wetlands elsewhere and exert all effort possible to eliminate disruption of this area.

Response. Upon further review and analysis, the community garden is no longer under consideration as a mitigation site.

- S49.6. Traction power and train control structures will be constructed on the site of the present CalTrain station. These structures will be screened from homes on Huntington Avenue. What about the 1st Avenue and Lyons Field? We request these structures be located in an area farther south.

Response. Please refer to Response 8.1 for a discussion of visual impacts and screening in this area. As stated in Response 11.6, BART will consider this request to locate the substation as far south as feasible during the preliminary engineering phase.

- S49.7. Where will the CalTrain station be during and after construction?

Response. Please refer to Responses 8.1, 9.2, and 70.8 concerning the San Bruno CalTrain Station.

- S49.8. During and after construction, we need safe access by foot to the school and to downtown for our children.

Response. Safe pedestrian access, including access to Belle Air School, would be provided across the CalTrain tracks in the vicinity of Angus Avenue in San Bruno during construction. After construction of the BART extension, the BART alignment would be underground under the Aerial Design Option LPA, and pedestrian access across the CalTrain tracks would be the same as before construction of the extension. Please refer to Response 24.4 for further discussion of access across Angus Avenue during construction.

- S49.9. I just want to speak about the Angus crossing. Some attempt has been made to make a smooth interaction at Huntington, but at First Avenue, the SDIR shows the same awkward and inefficient connection there.

Response. Please refer to Response 8.8 for a discussion of the realignment of Angus Avenue as part of the BART extension project.

S50. WHEELER, JIM

- S50.1. We support BART as a world-class mass transit system, but we oppose the extension of BART past Colma. This extension is extremely expensive, and SamTrans is expected to pay for one-quarter of the construction costs plus all of the continuing operation and maintenance costs of BART within San Mateo County.

Response. The commentor's opposition to the BART–San Francisco Airport Extension is noted. Public input regarding the merits of the different alternatives was considered by the BART and SamTrans boards in their selection of the Aerial Design Option as the Locally Preferred Alternative (LPA) in November 1995. Please refer to Response 10.3 for further discussion of the selected LPA. Please also refer to Section 1.3 of the Summary DEIR/SDEIS, which explains the need for the project, and Response 23.2 for a discussion of the studies demonstrating the need for a rail transit project south of Colma.

- S50.2. We are very concerned that the financial impact on SamTrans will force cutbacks on bus lines and CalTrain. SamTrans should be improving the bus system and CalTrain, not cutting back.

Response. The cost effectiveness of the SamTrans bus system will be improved through the Comprehensive Route Renovation Study, which is designed to identify system modifications, including eliminating redundant and inefficient services. There are no plans to cut CalTrain service.

Please refer to Response 6.67 for a discussion of SamTrans' commitment to maintaining bus, rail, and paratransit operations.

- S50.3. We do not believe the ridership figures being used to support the BART extension past Colma. For example, who really believes that 19,000 CalTrain riders will get off the morning northbound trains, wait for a BART train, travel a much longer and slower route to downtown San Francisco? That is incredible.

Response. Ridership preferences would be partly depend on where in San Francisco or the East Bay the traveler is destined. For example, not all passengers travel to the Financial District; thus, for such northbound passengers, BART service would be preferable. Please note that CalTrain wants to extend its tracks to a downtown transportation center in order to offer an intermodal connection with SamTrans, Muni, and AC Transit. Please refer to Response 23.6 for a discussion of transfers between BART and CalTrain. Please refer to Response 6.11 for a discussion of travel times comparisons between the BART extension and CalTrain.

3.7 ADDITIONAL COMMENTORS

A1. FEDERAL AVIATION ADMINISTRATION

- A1.1. The FRDEIR/S#2DEIS has not adequately described the cumulative impacts of concurrent construction activity for the BART railway/terminal station and the SFIA Airport Light Rail System, Airport Terminal and other Airport Master Plan Projects, if concurrent construction is anticipated. The FAA acknowledges the fact that the BART environmental document is intended to be a stand alone document as stated on page 1-6, Purpose and Need. The FAA is required to consider cumulative impacts within the scope of its authority.

"Section 1508.7 of the President's Council on Environmental Quality Regulations (40 CFR 1508.7) states that "cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Response. The SFIA Master Plan FEIR (May 1992) was reviewed to identify the duration and activities during the construction period for the SFIA Airport Light Rail System, the Airport Terminal, and other SFIA Master Plan projects. A description of cumulative construction-period impacts of projects in the SFIA Master Plan and the BART-San Francisco Airport Extension was included in Chapter 3, Section 13 of the DEIR/Technical Appendix.

The Aerial Design Option LPA would traverse Highway 101 just to the north of the SFIA International Terminal Inbound/Outbound ramps. Construction of the foundations, columns and superstructures over the freeway would require narrowing mainline freeway lanes, lane closures and night time detours for both projects. It is anticipated that SFIA will construct that portion of the aerial wye alignment that crosses Highway 101 as part of the Airport Inbound/Outbound ramps to minimize overall duration of freeway impacts and costs to both agencies. In this circumstance, a single contractor would undertake all construction over Highway 101.

The SFIA will construct all BART facilities east of U.S. Highway 101 as part of its Master Plan. The construction plan under the Aerial Design Option LPA includes access to Highway 101 via the southbound collector/distributor road for Highway 101. The construction-related volume of 1 to 30 trucks per hour would not be enough to cause additional traffic congestion based upon travel demand model estimates. The 30 trucks per hour maximum would only occur for an estimated two to three weeks when excavation and concrete pours occur simultaneously. As described on page 3.13-19 in the FRDEIR/S#2DEIS, the maximum truck volume during most of the construction duration for the BART extension project would be an estimated 15 to 30 trucks per hour. The design of the access road to the southbound collector/distributor road would include acceleration and deceleration lanes so that these truck movements would not create a safety problem.

Other types of cumulative impacts related to the SFIA Master Plan expansion, in addition to traffic impacts, are addressed in the DEIR/Technical Appendix. Under the analysis of land use impacts, cumulative impacts on the character of the airport community would occur if any of the BART build alternatives are built concurrently with expansion activities at the SFIA as described on page 3.13-67 of the DEIR/Technical Appendix. Coordination with the SFIA would partially reduce the cumulative land use impacts but these impacts would remain significant. SFIA police and fire departments would be potentially affected by cumulative impacts from concurrent construction of the BART and SFIA projects as described on page 3.13-101. The SFIA police and fire departments would be informed by the project sponsors of proposed construction plans as well as road closures and would work to achieve a mutually acceptable traffic detour/rerouting plan. Utility service interruptions in the vicinity of the project corridor would potentially have cumulative impacts from concurrent construction of the BART and SFIA projects and would be mitigated through the timing of service disruptions and provision of temporary backup service as described on page 3.13-106 of the DEIR/Technical Appendix. Cumulative settlement and erosion impacts could occur with the BART build alternatives that traverse SFIA property east of Highway 101 with concurrent construction of the SFIA expansion. These settlement and erosion impacts would be mitigated through proper construction techniques employed by each project as described on page 3.13-120 of the DEIR/Technical Appendix. Due to background ambient noise levels at the SFIA, cumulative construction noise impacts would not occur from concurrent construction of BART and SFIA projects. Cumulative air quality impacts would occur with concurrent construction of the BART and SFIA projects under Alternatives IV, VI, and Design Option V-A that would partially be reduced through specific measures but would still temporarily exceed state or federal criteria as described on page 3.13-206 of the DEIR/Technical Appendix.

All environmental impacts associated with the proposed BART extension are identified and appropriate mitigation proposed. As discussed above, the cumulative impacts of concurrent construction of the BART Extension project and the SFIA Master Plan projects are identified and analyzed to the maximum extent possible. However, these construction-related cumulative impacts cannot be quantified further because the quantity and phasing of airport-related construction activities are not contained in the SFIA Master Plan FEIR and have not been made available by the SFIA.

- A1.2. The BART/FTA environmental document has been prepared based on the standard methodology employed to forecast transit ridership. The benefits to airport vehicle trip reduction to the airport may not be consistent with SFIA Master Plan forecast. The FAA Air Quality Analysis to be prepared pursuant to the current FAA/SFIA Memorandum of Understanding (MOU) for the NEPA-Environmental Assessment (EA) for the Master Plan will employ the general conformity air quality criteria. It is the understanding of the ADO that the BART/FTA environmental analysis employed the transit/highway air quality criteria. No mention of an airfield or airport terminal curbside analysis of emissions is discussed in the BART/FTA document.

Response. The ground transportation impacts of the SFIA Master Plan were included in the BART-SFIA Extension DEIR/SDEIS cumulative impacts analysis. The travel demand model used to forecast transit patronage and traffic volumes was based on population and employment projections by the Association of Bay Area Governments (ABAG). Special attention was given to review these forecasts

and compare their results to projections contained in the SFIA FEIR. Vehicle trips were added to the trip tables provided by the Metropolitan Transportation Commission (MTC) so that these tables used in the DEIR/DEIS would match the mid-range forecasts made in SFIA FEIR. (Note: Mid range was defined by averaging the high-end and low-end forecasts of vehicle trips.) Cumulative freeway traffic impacts under the Aerial Design Option LPA are addressed on pages 3.1-13 and 3.1-14 of the FRDEIR/S#2DEIS. In addition, the results in Table 3.1-93, Alternative VI Estimated Freeway Impacts Highway 101, of the DEIR/Technical Appendix also apply to the Aerial Design Option LPA.

The BART extension is a "transportation" project as defined in the EPA air quality conformity regulations. As required by the EPA regulations, the air quality conformity analysis in the DEIR/SDEIS and the FRDEIR/S#2DEIS is based on the transit/highway air quality conformity criteria. Airfield emissions are not considered because the BART project will have no effect on emissions from aircraft and ground equipment, and because airfield emissions do not affect the project's localized "hot spots" analysis. Curbside vehicular pollutant emissions at the airport terminal are not addressed in the DEIR/SDEIS analysis because the BART station at the Airport International Terminal does not include any vehicle parking and therefore will not add to vehicular pollution emissions at the airport. The BART extension would decrease vehicle trips to the SFIA terminals compared to the No Build Alternative and thus would have a beneficial effect on curbside vehicular pollutant emissions.

- A1.3. An air quality emissions inventory for construction activity will be required for concurrent construction of the BART airport station, the SFIA Airport Light Rail System (ALRS), highway off ramps, airport access roadways and construction equipment, if concurrent construction is anticipated.

It is anticipated that the BART/FTA NEPA document will be completed in advance of the FAA/SFIA EA. A decision on air quality conformance for an intermodal project must be made to support Airport Layout Plan (ALP) approval and possible Airport Improvement Program (AIP) and/or Passenger Facility Charge (PFC) funding approval.

Response: As noted in Response 1.1, the SFIA Master Plan FEIR does not provide an air quality emissions inventory for construction activity that would enable BART to assess the cumulative effects from concurrent construction activity, if the construction schedules for the BART extension were to coincide with that of the SFIA. The SFIA Master Plan FEIR, nevertheless, indicates that construction activities could lead to violations of the state PM10 and ozone standards, and that emissions from construction vehicles and equipment would "be temporary and would only incrementally contribute to local and regional air quality."

BART's air quality emissions inventory for construction is presented as Table 3.13-4 of the FRDEIR/S#2DEIS. These emissions would exceed the significance criteria adopted from the Bay Area Air Quality Management District guidelines. An additional increment resulting from concurrent construction of the SFIA Master Plan projects could result in exceedances of air quality standards during construction as discussed in Volume 1, Chapter 3.13, Air Quality, pages 3.13-81 to 3.13-82. Planned mitigation measures are described in Volume 1, Chapter 3.13, Air Quality, pages 3.13-81 to 3.13-82.

The FAA comments regarding decision approval of the ALP are noted. The FAA should be aware that in making a conformity determination for ALP approval for portions of the BART project or airport property, the FAA may rely on FTA's conformity analysis.

- A1.4. Several wetlands and endangered species issues remain to be resolved by BART/FTA. The San Francisco garter snake, red-legged frog and their supporting habitat may be impacted by the on-airport aerial portion of the railway. The document contains no U.S. Fish and Wildlife Service (USFWS)/Corps of Engineers correspondence to support a "take" of habitat or species. Therefore, the FAA cannot determine if NEPA requirements for Section 7 consultation, or wetlands demarcation,

(Section 401 to 404 permit issues) have been defined. If required construction of on-airport mitigation habitat may have an adverse impact on airport operations and development, the location and acreage of restored habitat must be defined on the ALP to evaluate safety issues. Impacts on the SFIA wildlife management program need to address bird strike potential.

Response. BART has completed the Section 7 Consultation process under the Federal Endangered Species Act with the US Fish and Wildlife Service (USFWS). As part of the Section 7 consultation process, BART prepared and submitted to the USFWS a Biological Assessment (BA), which identifies the potential impacts to the endangered San Francisco garter snake (SFGS) and the threatened California red-legged frog and defines a proposed mitigation plan to avoid and/or minimize the impacts to preserve the species on the proposed project site. This BA can be found in Volume 5 of this FEIR/FEIS. As required in Section 7 of the Federal Endangered Species Act, the USFWS issued a Biological Opinion (BO) on the proposed project which outlined what conditions and requirements the proposed project must meet to avoid jeopardizing the continued existence of the SFGS and California red-legged frog on the proposed project site.

BART has been in consultation with the US Army Corps of Engineers (Corps) and has submitted a Section 404 permit application to the Corps. BART identified all possible project impacts to "waters of the US" in the permit application as well as a proposed mitigation plan to compensate for those impacts that would be unavoidable. Details of the Section 404 permit are presented in the Public Notice prepared by the Corps and the proposed Mitigation Plan prepared by BART for the Section 404 permit in Volume 5 of this FEIR/FEIS.

A Wetland Delineation Report was prepared by BART (January, 1995) and verified by the Corps (August 1995). This report was included as a technical appendix of the 1995 DEIR/SDEIS for the BART-SFIA Extension Project. It is in this report that all the wetlands and other waters of the US are identified and "demarcated".

After further consultation with the USFWS and the SFIA, BART and these agencies have determined and agreed upon a set of mitigation measures that would not involve the creation or "construction" of wetland habitats on airport property and thus there would be no adverse impact on airport operations and development potential. Regarding bird strikes, the proposed wetland mitigation efforts would all be on or in the immediate vicinity of the west-of-Bayshore parcel and would be an enhancement to the same type of habitat and vegetation that now exists. Therefore, the potential for attracting birds to this site would be no different than currently exists.

All wetland habitats that are to be restored are identified in the Section 404 permit Public Notice and Mitigation Plan in Volume 5. All restored wetlands are to occur in the same locations at which they currently exist and thus would not create or increase any safety issues on these sites.

- A1.5. The FAA has not reviewed hazardous material impacts due to fuel line relocation, if any exist. The FAA advises FTA that hazardous material mitigation funding is limited to a NPDES permit requirement or mitigation associated with an airport project covered by a FAA NEPA environmental document.

Response. No fuel line relocation will be required on the west-of-Bayshore parcel for the BART-SFIA Extension project. The California Regional Water Quality Control Board, which is the lead agency for hazardous material remediation at the airport, has issued a clean-up order identifying the Airport and tenants as responsible parties for remediation of hazardous materials on the airport property.

Information provided by the landowner indicates that no fuel lines will be encountered along the alignment east of Highway 101 into the SFIA. The BART extension into the SFIA will be a shared alignment with the SFIA ALRS. East of Bayshore improvements will be designed and constructed by

SFIA. If other hazardous materials are encountered, the responsible party will be identified and all applicable laws complied with.

- A1.6. The BART railway, Airport Station and SFIA ALRS need to be included on an ALP for the FAA to complete an airspace and airport design standards review.

Response. The comment is noted that the FAA, in order to complete the Air Space and design standards review of the ALP, needs to consider the BART alignment, Airport ALRS and the BART Airport Station.

- A1.7. Aerial Wye-Stub to the SFIA. We suggest that the description of this proposal use the phrase "Aerial "Y" Stub." This would be more easily understood by the general public and not give the document the appearance of being unnecessarily complex.

Response. The word "wye" is standard railroad terminology and correctly used in the text. For clarification, Section 1.2 BART Board Action, clearly describes the aerial wye stub as two aerial (east-west) guideways to diverge from the BART mainline along the existing CalTrain tracks, one from the north and one from the south, to proceed east towards the SFIA. The guideways would merge over Highway 101, continue east to the planned Airport International Terminal.... Further, the project description in Chapter 2 of Volume I of this FEIR/FEIS, describes the design option as an east-west aerial wye-stub perpendicular to the CalTrain mainline terminating at the planned Airport International Terminal. The aerial wye stub is also shown in Figures 2.3-1, 2.3-2 and 2.3-7.

- A1.8. The page numbering system is difficult to follow and is confusing. For example, at the end of the overview section, the last page is page 3-2, the next page is 3.1-1. We recommend that simple page numbering system by chapters be used as: "3-1, 3-2, 3-3," etc.

Response. The page numbering system was created to facilitate review by public agencies and members of the public. This system adopted, in fact, is almost identical to that suggested by the commentor. Page 3.3-2, for example, refers to Chapter 3, Section 3, page 2; page 3.13-127, Chapter 3, Section 13, page 127. This numbering convention was applied only to Chapter 3, which is especially lengthy and where dividing the chapter into smaller segments aids the reader. Accordingly, each section is individually identified in the footer of each page, both by name and by section number. The example noted by the commentor, where page 3-2 is followed by 3.1-1, occurs because the first substantive section in Chapter 3 is Section 1, Transportation, but there are several preceding pages that are intended to provide an overview to the chapter. These preceding pages were not assigned their own section number; hence, their page numbers do not include a section identifier.

- A1.9. The organization of Chapter 3 gives the appearance that each section is a chapter when in fact it is only a portion of the chapter. We recommend that the use of subheadings with a large blank area at the top of the page deleted. This will help to improve the readability of the document.

Response. As noted in Response A1.8 above, the page numbering system was chosen to aid in the readability of the document. The page layout does not include "a large blank area at the top of the page." The page layout does, however, include a footer that identifies the appropriate section, both by name and number, to assist readers in locating sections of interest.

- A1.10. Cover Page. The Cover Sheet has not been prepared in accordance with the President's Council on Environmental Quality (CEQ) Regulations Section 1502.11. Section 1502.11 clearly describes that the cover sheet is not to exceed one (1) page. The cover sheet needs to include all the information required by CEQ Section 1502.11 on only one page such as identifying all lead Federal, state and local agencies as well as the Federal Highway Administration (FHWA) and the Federal Aviation Administration (FAA) as cooperating agencies pursuant to CEQ Section 1501.6(a) (1). The Cover Sheet must also

include a brief abstract (one paragraph), names, addresses and telephone numbers of the contact person(s) and the date that comments on this document are due from the public.

The County of the proposed BART extension should be identified simply as "San Mateo County, California."

The signatures on the document at the bottom of the second page are not required by CEQ, however, if the Federal Transit Administration and the other State lead agencies require signature pursuant to any environmental documentation requirements, then they can be retained on this page.

Response. All contents of the cover page conform to CEQA Regulation Section 1502.11, and FTA has approved the current format and layout of the cover page.

- A1.11. Page 2-13, Section 2.2, Route Description and Alignment, Airport International Terminal Station. The location of the traction power station and train control bungalow needs to be clearly identified on the various drawings illustrating the location of the proposed BART extension.

Response. The location of traction power substations and train control bungalows are described in Chapter 2, Project Description pages 2-13 and 2-17. The location of all traction power substations and/or train control bungalows south of Angus Avenue in San Bruno are shown in the Design Appendix in the FRDEIR/S#2DEIS Figures 1, 3, and 6.

- A1.12. Page 2-19, Table 2-1, Correct the Typographical error for the words "Start up" in the left side of the table.

Response. In Table 2-1 on page 2-19 of FRDEIR/S#2DEIS, the words "start up" in the far left column appear as "Start up." In Volume I of this FEIR/FEIS, the words have been corrected to appear as "start up."

- A1.13. Page 3-1, Chapter 3, Overview of this Chapter. The third bullet paragraph describes the use of the italicized classification of impacts that are used at the end of the various discussions in this chapter. We recommend that the words "significant impact," "insignificant impact" or "beneficial impact" be used rather than the single letters. The meaning of these letters to the lay reader will be lost quickly after the reader has gotten into this chapter. Spelling out of this abbreviation will make this document more "user friendly."

Response. The project proponents intended to make the environmental documents "user friendly." To this end, frequently used phrases and names have been abbreviated to make the documents more concise and readable. A glossary and a list of acronyms is also provided in Appendix A of Volume I.

- A1.14. Page 3.1-5, First paragraph at the top of the page. A reference to a DEIS/DEIR being prepared by CalTrain has become dated (indicating a 1995 release date). Please update this to indicate if the document has been prepared and released or is still yet to be released.

Response. Response 8.8 of Volume III of the FEIR/FEIS updates this information to indicate that the CalTrain San Francisco Downtown Extension Project Draft Environmental Impact Statement/Report is currently scheduled for public circulation and comment in the Fall of 1996.

- A1.15. Page 3.2-4, Aerial Wye-Stub to the SFIA. Paragraph Number 4 indicates that BART will acquire right-of-way for the SFIA BART extension. This section should clearly indicate if they intend to purchase land from SFIA or acquire an easement. If land is to be purchased then a release of grant-in-aid obligations may be necessary from the FAA.

Response. The current draft of a Memorandum of Understanding now in negotiation between BART and the SFIA suggests that the SFIA will permit BART access to SFIA property for activities related to design, construction, inspection, operation and maintenance of the proposed project over SFIA property, but the parties have not specified the legal form that such permission will take. The Design Appendix Volume IV of the FEIR/FEIS will contain the correct land use designation for all airport property required for the proposed project.

- A1.16. Page 3.7-3, Section 7.1-1.1. The text of the document indicates that a wetlands replacement ratio would range from 1:1 to 3:1; however, there is no discussion as to how this range was determined or if it is acceptable to the U.S. Army Corps of Engineers. We recommend that this information be included in this section of the document.

Response. The Corps has issued a preliminary agreement statement on the proposed mitigation measures including the replacement ratio for wetlands. A copy of this agreement can be found in Volume 5 of this FEIR/FEIS.

- A1.17. Page 3.7-6, Aerial Wye-Stub to SFIA. This section references the need for cooperation from SFIA for mitigation. If it is the intention of BART to purchase in fee or easement, land necessary for the BART extension, then the document must clearly state this.

Response. The need for cooperation from SFIA for mitigation is necessary since short term habitat improvements that are proposed for enhancing existing habitat of the endangered San Francisco Garter Snake on the west-of-Bayshore property, would require approval from the property owner, the SFIA. SFIA has stated that any proposal for mitigation of the project impacts on the Airport's west of Bayshore cannot reduce the utility of the airport's use of that property, consistent with the commission's authority and responsibility to wisely manage airport property and to ensure the ability to develop facilities to meet future needs. These short term management activities proposed by BART will not require purchase of land nor reduce the utility of the airport's use of property.

- A1.18. Page 3.7-7, Paragraph No. 4. The document indicates that the proposed Y-Stub will cause a significant impact to various endangered species. The text indicates that various individuals of the species will be "displaced." The document must clearly indicate if it is the intention to trap and relocate species such as the San Francisco garter snake and the California red-legged frog. Certain "take" permits will be necessary from the U.S. Fish and Wildlife Service pursuant to the Endangered Species Act. Further, this type of action may require Formal Section 7 consultation with the U.S. Fish and Wildlife Service.

Response. The term "displace" is in reference to upland and wetland habitats, specifically "0.59 acres of upland and wetland habitats," not individuals of any particular wildlife species. The only trapping of any species would be of SFGSs as part of the Captive Feeding Program Mitigation Measure which is defined in detail in the Biological Assessment (BA) and Biological Opinion (BO) in Volume 5 of this FEIR/FEIS. The BA and BO were prepared in compliance with the Section 7 formal consultation process BART completed with the USFWS.

- A1.19. Page 3.13-2, Construction. This section fails to discuss any impacts related to noise generated by pile drivers. Figure 3.13-1 clearly indicates that a pile driver will be used to construct the temporary trestle.

Response. BART will impose noise and vibration limits on construction contractors (refer to Tables 3.13-13 and 3.13-14 in DEIR/Technical Appendix). The noise and vibration limits BART will impose are designed to reduce annoyance where noise and vibration from construction would last for more than a couple of weeks. The noise and vibration impacts of unshielded pile drivers for construction of the aerial wye-stub to the Airport is discussed on page 3.13-38 of the FRDEIR/S#2DEIS.

Also as shown in Figures 3.13-1 and 3.13-2, BART is considering normal piles for the temporary construction trestle and drilled caissons for the permanent BART aerial structure across the west of Bayshore property. Drilled caissons is one method to decrease the amount of noise and ground vibration generated during placement of piles and is one technique to meet BART's construction criteria. BART will evaluate the need for other than normal pile driving for the temporary construction trestle and for the permanent BART aerial structure during preliminary engineering. BART will mitigate its construction noise and vibration impacts to meet its construction criteria.

- A1.20. Page 3.13-2, Construction. The text of the document should clearly indicate what will happen to the temporary trestle upon completion of the aerial structure. It appears from Figure 3-13.2 that the trestle is removed and the piles used to support it are abandoned in place. If this is the case, then the text should so indicate.

Response. The FEIR/FEIS, Volume I indicates that the temporary trestle over the west of Bayshore property will be removed upon completion of the BART aerial structure and the piles will be left in place below the ground level.

- A1.21. Page 5-1, Department of Transportation, Section 4(f) Evaluation. The last sentence on the page indicates that Lion's Field Park may experience a "constructive use." However, this sentence is negated in the discussion in the mitigation measures. We recommend that the document clearly indicate if the FTA and BART have determined that operations near Lion's Park will or will not be a constructive use.

Response. Text at the bottom of page 5-1 of the FRDEIR/S#2DEIS suggests that there may be constructive use, as defined by Section 4(f) of the U.S. Department of Transportation Act of 1966, at Lion's Field. This effect depends on the particular contractor laydown area selected by BART, as noted in the immediately preceding text on page 5-1. Preparation of Section 4(f) evaluations require consideration of potential effects, prior to adoption of any mitigation measures. Accordingly, each of the contractor laydown areas involves different effects at Lion's Field, and thus the statement at the bottom of page 5-1 (i.e., Lion's Field Park may experience a "constructive" use) is accurate.

Section 4(f) then requires project sponsors to consider planning and other mitigation measures that can minimize "use" of Section 4(f) affected lands. The actions identified on page 5-2 of the FRDEIR/S#2DEIS, under "Planning and Mitigation Measures," would reduce effects sufficiently such that the last statement (i.e., these measures would minimize adverse effects of the laydown area so that constructive use of Lion's Field Park would not occur) is also accurate.

- A1.22. Page 6-1, Financial Analysis. This section indicates that airport revenues from SFIA are intended to be used for development of the BART Structure. However, since the proposal is not currently depicted on the approved Airport Layout Plan for SFIA, the FAA is not able to make a determination of eligibility of funding this type of development at this time. We recommend that where SFIA funds are indicated, a footnote be shown indicating "subject to funding eligibility." This would be consistent with the footnote in Table 6-4.

Response. The footnote "Subject to airport funding eligibility" as seen in Table 6-4 will be added to Tables 6-3 and 6-5.

- A1.23. Page 6-7, SFIA Funds. It is important to note that the FAA has not yet made a determination of eligibility of this project for the use of federal funds, since the proposed BART extension is not yet shown on the approved Airport Layout Plan.

Response. The commentor is correct that the BART extension is not currently shown on the SFIA ALP and the comment noted that final determination of funding eligibility for SFIA funds cannot be made until such time as the ALP is revised. However, preliminary indications from the FAA indicate

that elements of the project will be eligible for funding by SFIA. In particular, the FAA sent a letter to Louis Turpen, then Director of Airports, on approximately March 1, 1995 discussing the issue of funding for the proposed extension. Cynthia Rich, Associate Administrator for Airports, wrote, "This is in reply to your letter of October 4, 1994, regarding the proposed expenditure of Airport funds to provide partial funding for an extension of the Bay Area Rapid Transit (BART) System to the San Francisco International Airport (SFIA). . . Airport revenue spent on items which would be eligible for funding under the Airport Improvement Program (AIP) or the Passenger Facility Charge (PFC) Program would be clearly airport related and, therefore, not constitute a diversion of revenue. Airport revenue may also be spent on items which are not eligible for AIP or PFC but which are within the ambit of permitted uses in the revenue assurance. . . We have concluded that use of airport revenue to pay, in part, for the construction of BART facilities on SFIA as described in the BART San Francisco Airport Extension Draft Environmental Impact Report/Supplemental Draft Impact Statement, January 1995 (EIR/EIS), would not be an improper diversion of airport revenue under the revenue assurance."

- A1.24. Page 8-1, List of Preparers. This section has not been prepared in accordance with CEQ Section 1502.17. This section needs to clearly identify the names of the preparers, including lead Federal, state and local agencies and cooperating Federal agencies. The qualifications of the various individuals listed and their respective responsibilities for the document must be included in this section.

Please include the appropriate personnel for the Federal Highway Administration and the Federal Aviation Administration as cooperating agencies.

The listing of qualifications and responsibilities is important since the list of preparers for BART appears to include persons that are no longer involved as indicated by the word "former."

Response. The CEQ Guidelines, Section 1502.17, states, "The environmental impact statement shall list the names, together with their qualifications (expertise, experience, professional disciplines), of the persons who were primarily responsible for preparing the environmental impact statement or significant background papers."

Chapter 8 lists all individuals who had substantive roles in preparing the draft environmental documents for the BART-San Francisco Airport Extension. The identified lead agencies, FTA, BART, and SamTrans, have provided ongoing review of the analyses since 1993, as well as definition of the project alternative, including preliminary engineering, cost, and financing details. The contribution, the principal individuals, and their qualifications (in the form of college degrees) are presented for each consultant with a substantive role.

The FHWA and FAA are identified as cooperating agencies on the cover/signature page of the draft environmental documents.

- A1.25. Including the following persons and qualifications for the FAA:

John L. Pfeifer, Manager, San Francisco Airports District Office. Joseph R. Rodriguez, Supervisor, Planning and Programming Section, San Francisco Airports District Office.

Response. As noted in Response A1.24, the CEQ Guidelines require that EISs list those individuals/agencies with substantive roles in the preparation of the environmental document. The FAA provided comment letters during the public review period that serve to identify areas of clarification in the draft environmental documents. However, the list of preparers focused on persons with primary responsibility for preparation of the draft.

- A1.26. Page 9-1, Distribution List. The listing of the Federal Transit Administration, the Federal Aviation Administration and the Federal Highway Administration, as recipients of the document is not in accordance with these agencies as the authors of the document. We recommend that the listing of the

various Federal, state and local governmental agencies that are responsible for the preparation of this document be deleted from the distribution list.

We also recommend that since many of the other various Federal, state and local agencies have different offices with different functions, the addresses of these agencies be included to further document where the DEIS was sent and coordinated.

Response. The Distribution List, Chapter 9 of the FRDEIR/S#2DEIS included all federal, state, regional and local agencies, organizations, libraries, schools and hospitals which received the document whether or not they were also one of the preparers of the document. The distribution list includes the FTA, FAA, FHWA, SamTrans and BART because they received the document. Chapter 8, List of Preparers, clearly identifies the preparers of the document.

- A1.27. Page 9-3, Section 9.6. Please include the addresses of the various libraries where the DEIS is available for public review.

Response. For brevity, the addresses of the recipients, including the libraries, of the FRDEIR/S#2DEIS was not included in the distribution list.

A separate cover sheet accompanied the DEIR/SDEIS when it was distributed to agencies, organizations and members of the public in January 1995. As a service to the public, this cover sheet included the addresses of the libraries and city halls where the DEIR/SDEIS was available.

Chapter 4

Revisions to DEIR/Technical Appendix and FRDEIR/S#2DEIS

4.1 INTRODUCTION

This chapter of Volume III contains revisions to the DEIR/Technical Appendix and the FRDEIR/S#2DEIS as a result of responses to comments on the DEIR/SDEIS and the FRDEIR/S#2DEIS. The revisions are presented in a tabular format and organized as follows:

- | | | |
|---------------|-----------|--|
| Column | 1: | Page No. – identifies the page number in the DEIR/Technical Appendix or the FRDEIR/S#2DEIS where the revision occurs. |
| Column | 2: | Response No. – identifies the response number in Chapter 3 of this volume that prompted the revision. |
| Column | 3: | Revised Text – identifies how the DEIR/Technical Appendix or the FRDEIR/S#2DEIS is modified. |

4.2 REVISIONS TO THE DEIR/TECHNICAL APPENDIX

Page No.	Response No.	Revised Text
3.1-108	64.5	Revise Table 3.1-74, Alternative VI, for the Poplar/Dore to 3rd Avenue segment of Highway 101 during the A.M. peak hour: F 10,200 6.3% <u>9,900 3.1%</u>
3.1-113	64.5	Revise Table 3.1-76, Freeway Level of Service - 2010 under Alternative VI for the Poplar/Dore to 3rd Avenue segment of Highway 101 during the A.M. peak hour: F 11,000 8.9% <u>10,400 3.0%</u>
3.4-34	4.5	Revise paragraph three: <u>Based on additional engineering performed in this segment, the Millbrae Railroad Station would not need to be relocated would be moved 15 feet west of its present location to accommodate the BART and CalTrain tracks. The building is on the National Register, and its relocation of the platform to the Millbrae BART Station is not considered would be a significant effect pursuant to Section 106 and CEQA (Appendices G and K) criteria.</u>

Page No.	Response No.	Revised Text
3.9-12	19.13	Revise Table 3.9-4: Change "Vibration" in right column heading to "Noise." Change "Research Library" to "Research Libraries" in the footnote.
3.9-13	19.13	Revise Table 3.9-5: Change "Noise Levels (dBA)" in right column heading to "Vibration Levels (dB)." Change the last listing and footnote to read "Research Laboratory."
3.10-3	2.27	Replace paragraph two: Ozone. In May 1995, the EPA approved the Bay Area Air Quality Management District's (BAAQMD) November 1993 request for redesignation, so that the Bay Area was redesignated as an attainment area for the federal O ₃ standard. The Bay Area is the largest metropolitan area in the United States to have achieved this distinction. However, the Bay Area remains designated as a nonattainment area for the state O ₃ standard, which is more stringent than the federal standard.
3.10-3, 3.10-4	2.27	Replace paragraph six with the following: The Bay Area Air Quality Management District (BAAQMD) is the local agency responsible for implementing state and federal air quality requirements. Responsibility for enforcement of federal requirements is the result of EPA approval of the <i>1982 Bay Area Quality Plan</i> (1982 Plan), also known as the State Implementation Plan or SIP, which indicates how the BAAQMD will implement federal air quality requirements. The BAAQMD updated the 1982 Plan and adopted the <i>Bay Area 1991 Clean Air Plan</i> (BAAQMD, 1991) to implement the requirements of the California Clean Air Act of 1988. As required by the California Clean Air Act and subsequent 1992 amendments, the BAAQMD also prepared the <i>1994 Clean Air Plan Update</i> (BAAQMD, 1994). In connection with its September 1993 request for redesignation of the Bay Area as a federal ozone attainment area, the BAAQMD prepared and submitted to the EPA a <i>Maintenance Plan</i> describing how the Bay Area would maintain its attainment of the federal ozone standard. EPA approval of the redesignation request in May 1995 also approved the Maintenance Plan as part of the SIP. Since the 1982 Plan, as amended, and the Maintenance Plan constitute the federally approved SIP for the Bay Area, the conformity provisions of the 1990 Clean Air Act Amendments specify the conditions under which transportation plans, programs, and projects will be considered to conform to the 1982 Plan, the Maintenance Plan, and the Clean Air Act.
3.10-4	2.27	Add after paragraph one: In November 1995, the MTC began the process of amending the TIP to specifically include the design concept and scope of the Alternative VI Aerial

Page No.	Response No.	Revised Text
		Design Option as the Locally Preferred Alternative and to program certain funding for the project. On February 28, 1996, the MTC amended the TIP to reflect these changes as well as a number of other new and revised projects. The MTC concurrently approved the <i>Supplemental Air Quality Conformity Assessment for 1995 TIP</i> (Supplemental Assessment). The Supplemental Assessment concludes that the amended TIP continues to conform to the Bay Area SIP. Further discussion of air quality and recent conformity decisions can be found in Volume I of the FEIR/FEIS.
3.13-51	9.1	Revise Impact 17: 17. <i>Construction activity would disrupt CalTrain service. (S)</i> Between Forest Lane the I-380 overpass and San Bruno Avenue Cupid Row, the western CalTrain track would be taken out of service for 12 to 18 months. CalTrain service would continue on a single track. Construction of the Hillcrest Boulevard underpass of the CalTrain tracks would take about four months and may cause delays to CalTrain service. CalTrain service would continue on two tracks. <u>Relocation of CalTrain tracks in the vicinity of the Millbrae Station would require approximately four months.</u> MITIGATION MEASURES. The following measures would reduce construction impacts to CalTrain service. Minor delays would be <u>insignificant</u> remain significant and unavoidable.
3.13-51	9.1	Add to the end of Mitigation Measure 17.1: All shooflies will be equipped with power switches and the controls tied into the automatic block signal system to avoid major delays.
3.13-52	9.1	Revise name of Mitigation Measure 17.4: 17.4 <i>Maintain Two-track Operations During Construction at Hillcrest Boulevard and Millbrae Station.</i>
3.13-52	9.1	Add to the end of Mitigation Measure 17.4: Temporary shooflies will be used at these locations to maintain train operations on two tracks. 17.5 <i>Temporary Relocation of San Bruno Passenger Station.</i> During construction of the subway, the existing CalTrain station platforms, shelter, and parking must be moved to the vicinity of the I-380 overpass. Upon completion, the station facilities would be moved back to the existing location.
5-24	4.5	Revise paragraph one, sentence two: The train station would not be moved approximately 15 feet west of its present location to accommodate the BART railtracks but the station platform would be shifted 650 feet northward to the Millbrae Avenue BART Station.

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		<u>This would result in the south end of the platform being located approximately 100 feet north of the station.</u>
5-24	4.5	Replace the second complete paragraph: Planning and Mitigation Measures. No mitigation is needed for this site, as the Millbrae train station will not be relocated.
Appendix C	64.3	Revise Table C-8, Alternative VI, for the Poplar/Dore to 3rd Avenue segment of Highway 101 during the A.M. peak hour: F 10,200 12.1% <u>9,900 8.8%</u>
Appendix C	64.4	Revise Table C-12, Alternative VI, for the Poplar/Dore to 3rd Avenue segment of Highway 101 during the A.M. peak hour: F 11,000 8.9% <u>10,400 14.3%</u>

4.3 REVISIONS TO THE FRDEIR/S#2DEIS

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ES-5	36.9	Add to bullet one, end of last sentence: ...and from residences entering both the Marino Vista and North Millbrae neighborhoods from Center Street.
1-3	12.3	Revise paragraph one, sentence two, under Section 1.2, Purpose of this Report: <u>Consideration of these aerial options for bringing BART service into SFIA was prompted by recent actions of the U.S. Congress and BART related to project costs. BART, and the San Francisco Airport Commission related to the project costs and implementation of the SFIA's interest in minimizing impact and disruption in implementing the on-going 1989 San Francisco International Airport Final Draft Master Plan (referred to in this document as the SFIA Master Plan) was considered by BART in developing the aerial options.</u>
2-1	12.4	Revise paragraph three of Section 2.1, Project Description: Both Options B and X include passenger convenience features that are consistent with BART and San Francisco Airports Commission resolutions adopting BART Passenger Service Quality Standards. Both options Option B provides key features which Option X does not. acceptable walking timeframes to and from the International Terminal, the Terminal Complex,

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		and a convenient connection between BART and the ALRS. However, Option X provides minimal facility level changes, because the station platform is one floor above the departure level in the planned International Terminal.
2-16	4.15	Revise Figure 2-12 to reverse the words "EAST" and "WEST."
2-17	8.1	Revise paragraph two: Other. Traction power substations, ventilation buildings, gap breaker stations, train control bungalows, utility power feeds, and radio antennae north of Angus Avenue in San Bruno are the same as those described for Alternative VI in the DEIR/SDEIS, except the pocket track and car wash facility north of the Tanforan Station would be replaced by an auxiliary track and car wash facility in <u>Colma San Bruno</u> . The auxiliary track would be located adjacent to the existing Colma tailtracks and the Daly City Shop/Yard in Colma, at grade parallel to and east of the CalTrain tracks between Santa Inez Avenue and Santa Clara Avenue in San Bruno. The primary function of the auxiliary track would be to provide train access to the car wash facility, with a secondary function of train storage for up to two 10-car trains. The rail car wash facility and support building would be located across from Santa Clara Avenue along the auxiliary track. The CalTrain right-of-way and the existing dirt road alongside Lion's Field Park and terminating at First Street, which would be improved, would be used to access this facility.
3.1-16	12.9	Revise paragraph six, sentence one: <i><u>Under the Alternative VI Aerial Design Option (either Option B or X), pedestrian volumes would increase around the new Airport International Terminal and the Millbrae Avenue BART Stations compared to the No Build Alternative.</u></i>
3.3-2	8.14	Add to the end of the final paragraph: Although these structures are low-profile, the substation would occupy a plot of land with a 200x65x15-foot protective fence on the perimeter, and house two structures, one approximately 130x20x15 feet and the other 40x20x15 feet. An approximately 40x30x15-foot train control bungalow would occupy a plot of land with an approximately 80x60x15-foot perimeter fence. The ventilation building would be 165x50x20 feet. The vent shaft height would project 10 feet above finish grade.
3.3-3	36.9	Add after the last sentence of paragraph one under Impact 6: Views would also be obstructed from Center Street as residents enter both the Marino Vista and North Millbrae neighborhoods.
3.7-4	12.14	Add to the end of Mitigation Measure 1.2: The SFIA and the San Mateo County Flood Control District (SMCFCD) have recently implemented repair and maintenance of the Cupid Row Canal tide gates, and the gates are now operational. BART will implement a management program for the tide gates and will monitor the enhancement of freshwater habitats along Cupid Row Canal which occur as a result of the tide

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		gate management program. BART will work with the SFIA and USFWS to select the most appropriate management program, designed to enhance freshwater habitats while maintaining flood protection. BART will then implement the 20-year tidal gate program (with cooperation of the SFIA) and will monitor the effects upon the wetland habitats for the first five years of the program.
3.7-5	12.14	Add to the end of Mitigation Measure 2.1: The SFIA and the San Mateo County Flood Control District (SMCFCD) have recently implemented repair and maintenance of the Cupid Row Canal tide gates, and the gates are now operational. BART will implement a management program for the tide gates and will monitor the enhancement of freshwater habitats along Cupid Row Canal resulting from the tide gate management program. BART will work with the SFIA and USFWS to select the most appropriate management program, designed to enhance freshwater habitats while maintaining flood protection. BART will then implement the 20-year tidal gate program (with cooperation of the SFIA) and will monitor the effects on wetland habitats for the first five years of the program.
3.9-2	50.7	Replace Impacts 1 and 2 with the following: 1. <i>Between a point approximately 400 feet north of San Felipe Avenue in San Bruno and approximately 300 feet north of Madrone Street in Millbrae, a sound wall would be located between the CalTrain and BART alignments. The sound wall would not alter the visual setting for Lomita Park residents, since it would lie east of CalTrain and would be partially screened by both CalTrain and the existing trees west of the tracks. (I)</i> In order to reduce potential noise impacts to residents along Huntington and San Antonio Avenues, the Locally Preferred Alternative includes a sound wall located between the BART and CalTrain mainline rights-of-way. The sound wall would vary in height depending on potential noise impacts. The wall would not result in visual disturbance or obstruct significant views of the open space area at the SFIA west of Bayshore parcel. Views of this area are largely screened now by the eucalyptus trees, resulting in no net change in terms of views of the open space area.
3.13-1	12.24	Replace paragraph three, sentence two: Although no formal agreement has been reached, BART and the SFIA contemplate that, to the extent legally permitted, the SFIA will design and construct the portion of the BART project east of the western edge of Highway 101, including the highway overpasses, the International Terminal Station, and the support structures.
3.13-6	8.20	Revise paragraph five, sentence one: Alternative A, located in San Bruno and owned by the SFIA, is approximately 1.4 acres and would be located at the community gardens south of Lion's Field Park.

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3.13-14	12.24	<p>Replace paragraph four, sentence one:</p> <p>Although no formal agreement has been reached, BART and the SFIA contemplate that, to the extent legally permitted, the SFIA will design and construct the portion of the BART project east of the western edge of Highway 101, including the highway overpasses, the International Terminal Station, and the support structures.</p>
6-5	A1.22	The footnote "subject to airport funding eligibility" is added to Table 6-3.
6-7	A1.22	The footnote "subject to airport funding eligibility" is added to Table 6-5.
6-10	25.9	<p>Delete from Note 1 to Table 6.6 of Section 6, Financial Analysis:</p> <p>Table 3.1-8 of this document, and</p>
7-3	16.53	<p>Revise paragraph ten, sentences four and five:</p> <p>Overall, It does not appears that Alternative VI <u>may</u> would cause a disproportionate impact on high-minority neighborhoods <u>because</u> Although 97 63 percent of the displacements would occur in one high-minority neighborhood. <u>This would appear to outweigh the fact that</u> 67 percent of the neighborhoods bearing operational impacts and 83 percent of those incurring construction impacts would be mixed-populace neighborhoods.</p>
7-4	16.53	<p>Revise paragraph one:</p> <p>The Aerial Design Option would require relocating the same 208 households. Operational impacts may occur in <u>five</u> four neighborhoods, only <u>two</u> one of which are <u>is</u> a high-minority neighborhoods. Construction would cause impacts in 12 neighborhoods, two of them high-minority. Overall, It does not appears that the Aerial Design Option would <u>may</u> cause a disproportionate impact on high-minority neighborhoods <u>because</u> Although 97 percent of the displacements would occur in one high-minority neighborhood. <u>This would appear to outweigh the fact that</u> 75 60 percent of the neighborhoods bearing operational impacts and 83 percent of those incurring construction impacts would be mixed-populace neighborhoods.</p>
7-4	6.81	<p>Revise paragraph four:</p> <p>As discussed in the DEIR/SDEIS and above, the proposed project (1992 LPA), and the I-380 Least-Cost Design Option, Alternative VI, and the Aerial Design Option may result in disproportionate impacts on high-minority neighborhoods. None of the other alternatives, including the Aerial Design Option, would create disproportionate impacts on high-minority neighborhoods. Accordingly, Alternative VI and the Aerial Design Option appear to be consistent with the mandate of Executive Order No. 12898 to avoid disproportionate impacts on high-minority neighborhoods.</p>
7-4	6.81	<p>Revise paragraph five:</p> <p>Alternative VI and the Aerial Design Option may disproportionately impact low-income communities. However, with <u>With</u> respect to <u>high-minority and</u></p>

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		<p>low-income communities, the Executive Order No. 12898 only requires that “[t]o the extent practicable” such impacts shall be “identif[ied] and address[ed], as appropriate....” Although all All of the impacts discussed in this section are unmitigable, <u>and</u> these impacts have been appropriately addressed by identifying and analyzing a reasonable range of alternatives. Within the reasonable range of alternatives, only the No Build Alternative would not impose disproportionate impacts on low-income communities in the study area.¹</p> <p>¹ This analysis does not take feasibility considerations into account. <u>The build alternatives analyzed in this document have been shown, through an extensive public process, to be the only feasible build alternatives that satisfy project objectives.</u></p>

